

**FEB 10 2017**

Mr. Sanford Campbell  
Styrotek, Inc  
P.O. Box 1180  
Delano, CA 93216

**Re: Notice of Final Action - Title V Permit Renewal  
District Facility # S-1075  
Project # S-1153324**

Dear Mr. Campbell:

The District has issued the Final Renewed Title V Permit for Styrotek, Inc (see enclosure). The preliminary decision for this project was made on 12/07/2016. No comments were received subsequent to the District preliminary decision.

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. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,



Arnaud Marjollet  
Director of Permit Services

Enclosures

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

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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

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

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

# Permit to Operate

**FACILITY:** S-1075

**EXPIRATION DATE:** 06/30/2021

**LEGAL OWNER OR OPERATOR:** STYROTEK INC  
**MAILING ADDRESS:** PO BOX 1180  
DELANO, CA 93216-1180

**FACILITY LOCATION:** 545 ROAD 176  
(ROAD 176 & AVENUE 4)  
DELANO, CA 93215

**FACILITY DESCRIPTION:** PLASTICS 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:** S-1075-0-3

**EXPIRATION DATE:** 06/30/2021

## **FACILITY-WIDE REQUIREMENTS**

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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: STYROTEK INC  
Location: 545 ROAD 176 (ROAD 176 & AVENUE 4), DELANO, CA 93215  
S-1075-0-3 : Jan 31 2017 9:48AM -- VELASCOA

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. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. Should the facility, as defined in 40 CFR section 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 CFR section 68.10. The facility shall certify compliance as part of the annual certification as required by 40 CFR part 70. [40 CFR 68] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1075-3-13

**EXPIRATION DATE:** 06/30/2021

**SECTION:** NE32 **TOWNSHIP:** 24S **RANGE:** 26E

**EQUIPMENT DESCRIPTION:**

16.37 MMBTU/HR NATURAL GAS/LPG FIRED CLEAVER BROOKS BOILER WITH A CLEAVER BROOKS, MODEL NTI-15400HP ULTRA LOW NOX BURNER AND AN INTERNAL FLUE GAS RECIRCULATION SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC-regulated natural gas or commercial LPG. [District NSR Rule] Federally Enforceable Through Title V Permit
4. During start-up and shutdown, emissions from the exhaust of this boiler shall not exceed any of the following limits: 1.63 lb-NOx/hr; 2.42 lb-CO/hr; 0.05 lb-VOC/hr; 0.08 lb-PM10/hr; or 0.06 lb-SOx/hr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
5. The total duration of start-up and shutdown time shall not exceed 2.0 hours per day. [District Rules 2201,4305, 4306, and 4320] Federally Enforceable Through Title V Permit
6. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. Except during start-up and shutdown, while fired on natural gas, emissions from the exhaust of this boiler shall not exceed any of the following limits: 9 ppmvd NOx @ 3% O2 or 0.011 lb-NOx/MMBtu; 200 ppmvd CO @ 3% O2 or 0.148 lb-CO/MMBtu; 0.003 lb-VOC/MMBtu; 0.005 lb-PM10/MMBtu; or 0.00285 lb-SOx/MMBtu. [District Rules 2201,4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. Except during start-up and shutdown, while fired on LPG, emissions from the exhaust of this boiler shall not exceed any of the following limits: 9 ppmvd NOx @ 3% O2 or 0.011 lb-NOx/MMBtu; 200 ppmvd CO @ 3% O2 or 0.148 lb-CO/MMBtu; 0.003 lb-VOC/MMBtu; 0.005 lb-PM10/MMBtu; or 0.0034 lb-SOx/MMBtu [District Rules 2201,4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. If the unit is fired on both natural gas and LPG during any calendar year, additional source testing for NOx and CO emissions shall be performed for any fuel that is fired for more than 100 hours during that calendar year and that has not been previously tested as a part of the facility's annual source testing requirement. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure the VOC emissions from the boiler shall be conducted whenever the source testing for NOx and CO emissions is required and not less than once every 36 months using EPA Method 18 or EPA Method 25. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. The source test plan shall identify which fuel the source test is going to be performed on and the basis (ppmv or lb/MMBtu) that will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
15. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 , 4306, and 4320] Federally Enforceable Through Title V Permit
16. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 , 4306, and 4320] Federally Enforceable Through Title V Permit
18. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 , 4306, and 4320] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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



23. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate during District inspection that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1070, 1081, and 4320] Federally Enforceable Through Title V Permit
24. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. The permittee shall maintain daily records of the start-up and shutdown durations and number of occurrences of each. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1075-6-27

**EXPIRATION DATE:** 06/30/2021

**SECTION:** NE32 **TOWNSHIP:** 24S **RANGE:** 26E

**EQUIPMENT DESCRIPTION:**

EXPANDED POLYSTYRENE MOLDING OPERATION, INCLUDING PRE-EXPANDER AREA, PRODUCTION AREA, AND 3.0 MMBTU/HR NATURAL GAS/LPG FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SERVING PENTANE VAPOR CONTROL SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Tulare County 407] Federally Enforceable Through Title V Permit
3. Pre-expander area shall include two batch pre-expanders, and associated bead dryers, bin hoppers, blowers, screeners, screw conveyors, and twenty-eight 1,800 cubic foot capacity pre-expanded bead storage silos. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Production area shall include thirty-eight presses, belt conveyors, vacuum pumps, vacuum blowers and exhaust blowers. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Pentane control system shall include vapor collection piping network serving vacuum systems, molding machines and water drain vents and one regenerative thermal oxidizer (RTO). [District Rule 2201] Federally Enforceable Through Title V Permit
6. RTO shall incinerate VOCs recovered from the pre-expander(s), bead storage silo(s), or molding machine(s) at any time these units are in operation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The RTO shall be equipped with an operational temperature gauge to indicate the temperature of the combustion chamber. A continuous recording device shall be utilized to indicate the combustion chamber temperature during operation. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
9. Sampling ports adequate for extraction of grab samples, measurement of gas flow rate, and use of an FID, PID, or other District-approved VOC detection device shall be provided for both the influent and the effluent gas streams. [District Rule 1081] Federally Enforceable Through Title V Permit
10. Pentane content of raw bead supply shall not exceed 4.2% by weight on an annual average basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
11. Raw beads processed shall not exceed 128,310 pounds/day or 32,027,500 pounds/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Only natural gas and propane shall be used as auxiliary fuel for the combustion of VOC. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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13. Minimum volatile organic compound control efficiency across the RTO shall be 99% by weight. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
14. Minimum VOC (pentane) capture and control efficiency, calculated as VOC vapor capture efficiency multiplied by RTO control efficiency divided by 100, shall be 93% by weight. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. The total VOC emissions from the EPS molding operation including fugitive and RTO combustion emissions shall not exceed 140.0 pounds in any one day or 34,982 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The minimum operating temperature for the combustion chamber of the RTO shall be maintained at or above 1400 degrees F. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Combustion emission rates from RTO shall not exceed any of the following: NO<sub>x</sub> (as NO<sub>2</sub>): 117.0 ppmv @ 3% O<sub>2</sub> or 0.142 lb/MMBTU, CO: 100 ppmv @ 3% O<sub>2</sub> or 0.0737 lb/MMBTU, SO<sub>x</sub> (as SO<sub>2</sub>) 0.0164 lb/MMBTU, PM<sub>10</sub>: 0.0076 lb/MMBTU, or VOC: 0.0054 lb/MMBTU. [District Rule 2201] Federally Enforceable Through Title V Permit
18. RTO inlet ductwork and exhaust stack shall be equipped with adequate provisions facilitating the collection of samples from both the influent and the effluent gas stream sampling ports consistent with EPA test methods, i.e. capped sample port in accessible location of uniform flow. [District Rule 1081] Federally Enforceable Through Title V Permit
19. Permittee shall monitor and record the pressure upstream of the condenser (water knockout box) on a weekly basis to document that the system is under vacuum. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
20. Vapor control system capture efficiency shall be demonstrated annually by using the following calculation procedure:  $e \times f / (a \times b - c \times d)$  where a = pentane content of raw beads (lb/ton), b = raw bead input rate (tons/hr), c = pentane content of product (lb/ton), and d = product output rate (tons/hr), e = pentane vapor concentration at RTO inlet (lb/scf), f = flow rate into RTO (scf/hr). [District Rules 1070 and 4682] Federally Enforceable Through Title V Permit
21. For demonstration of vapor control system capture efficiency through source testing, at least three test runs covering at least one production cycle and at least 3 hours and no more than 24 hours in duration shall be conducted to determine capture efficiency. Protocols for data analysis must either meet the data quality objective (DQO) or lower confidence limit (LCL) approaches as described in EPA "Guidelines for Determining Capture Efficiency." January 9, 1995 and 40 CFR 51 Appendix M, Methods 204-204F, as applicable. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted annually to measure the following: 1) VOC emissions from the RTO and 2) RTO control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
25. 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.
26. During operation of the RTO, the permittee shall monitor and record combustion chamber temperatures at least once every 15 minutes. The temperature readings shall be at or above 1,400 F during which the pentane vapors are being combusted in the RTO. Upon detecting any excursion below the 1,400 F temperature reading, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 4682 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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27. The RTO's burner and its associated components and the vapor collection system shall be inspected thoroughly on an annual basis. The records of inspection shall at least contain date and time of inspection, identification of the person performing an inspection, parts replacement and repairs, and all maintenance actions taken. The records shall be kept and maintained for compliance inspection upon request. [40 CFR Part 64] Federally Enforceable Through Title V Permit
28. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
29. Vapor control system shall be visually and audibly inspected for leaks weekly. [District Rule 2201] Federally Enforceable Through Title V Permit
30. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit.
31. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
32. Permittee shall maintain daily records of RTO temperature, raw bead pentane content, and pounds of raw beads processed. [District Rules 1070 and 4682] Federally Enforceable Through Title V Permit
33. Permittee shall maintain records of vapor control system capture efficiency and RTO control efficiency. [District Rules 1070 and 4682] Federally Enforceable Through Title V Permit
34. Permittee shall maintain a record of all periods of non-operation of the RTO, including the dates, duration and reason(s) for the unit not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
35. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
36. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Tulare County Rule 407, SJVUAPCD Rules 1081, 4201, and 4682. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1075-7-7

**EXPIRATION DATE:** 06/30/2021

**SECTION:** NE32 **TOWNSHIP:** 24S **RANGE:** 26E

**EQUIPMENT DESCRIPTION:**

28.6 MMBTU/HR CLEAVER-BROOKS MODEL CB-700 SYSTEM 20 NATURAL GAS/PROPANE-FIRED BOILER WITH A CLEAVER-BROOKS MODEL NTI-15-700 ULTRA LOW NOX BURNER, FGR, AND O2 TRIM SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. The unit shall only be fired on PUC-regulated natural gas, and propane. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Except during startup and shutdown, emissions shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.008 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmvd CO @ 3% O2, or 0.0055 lb-VOC/MMBtu. [District NSR Rule, 4305, and 4306] Federally Enforceable Through Title V Permit
3. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 4305 & 4306] Federally Enforceable Through Title V Permit
4. Permittee shall maintain records of duration of each start-up and shutdown for a period of five years and make such records readily available for District inspection upon request. [District Rules 2080, 4305 & 4306] Federally Enforceable Through Title V Permit
5. Emissions of NOx shall not exceed 5.8 lb/day or 2004 lb/yr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Tulare County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit
7. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District NSR Rule, 4305 and 4306] Federally Enforceable Through Title V Permit
8. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] 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 at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
10. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
11. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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12. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
13. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
14. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
16. 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
17. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
18. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
19. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
22. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Tulare County Rule 407, SJVUAPCD Rules 1081, 4305, and 4306. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
23. This unit commenced construction prior to June 9, 1989. This unit has not been used to produce electricity for sale. Therefore, the requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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