



DEC 11 2018

Mr. Iram Rashid  
Pregis Innovative Packaging  
8201 W Elwin Ct.  
Visalia, CA 93291

**Re: Notice of Final Action - Title V Permit Renewal**  
**Facility Number: S-334**  
**Project Number: S-1172571**

Dear Mr. Rashid:

The District has issued the Final Renewed Title V Permit for Pregis Innovative Packaging (see enclosure). The preliminary decision for this project was made on October 10, 2018. 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

**Samir Sheikh**  
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



Facility # S-334  
PREGIS INNOVATIVE PACKAGING INC  
8201 W ELOWIN CT  
VISALIA, CA 93291-9262

### Notice of Permit Issuance

The enclosed permit unit requirements authorize the operation of the equipment as described. These permit unit requirements supersede any and all previous permits for the specified equipment.\* Please insert these documents into the Facility Permit to Operate, and post copies on or near the equipment as required by District Rule 2010.

Please contact any of our Small Business Assistance (SBA) staff at the numbers below if you have any questions:

Modesto:	(209) 557-6446
Fresno:	(559) 230-5888
Bakersfield:	(661) 392-5665

\*Failure to comply with the permit unit requirements may result in enforcement action.

**Samir Sheikh**  
Executive Director/Air Pollution Control Officer

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

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Tel: 661-392-5500 FAX: 661-392-5585



# Permit to Operate

**FACILITY:** S-334

**EXPIRATION DATE:** 01/31/2024

**LEGAL OWNER OR OPERATOR:**  
**MAILING ADDRESS:**

PREGIS INNOVATIVE PACKAGING INC  
8201 W ELOWIN CT  
VISALIA, CA 93291-9262

**FACILITY LOCATION:**

8201 W ELOWIN CT  
VISALIA, CA 93291-9262

**FACILITY DESCRIPTION:**

PLASTIC FOAM PRODUCTS MANUFACTURING

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

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

Samir Sheikh  
Executive Director / APCO

Arnaud Marjollet  
Director of Permit Services



# San Joaquin Valley Air Pollution Control District

FACILITY: S-334-0-2

EXPIRATION DATE: 01/31/2024

## 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 and Tulare County Rule 111] 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 and Tulare County Rule 111] 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, 9.8.1 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 and 4682, 6.1] 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: PREGIS INNOVATIVE PACKAGING INC  
Location: 8201 W ELOWIN CT, VISALIA, CA 93291-9262  
S-334-0-2 | Dec 10 2018 4:10PM - 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 8011 and 8021] 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 8011 and 8031] 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 8011 and 8041] 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 8011 and 8051] 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 8011 and 8061] 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 8011 and 8071] 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. On September 30, 2008, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin October 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
40. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
41. 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
42. 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
43. 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 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-334-1-3

**EXPIRATION DATE:** 01/31/2024

**EQUIPMENT DESCRIPTION:**

BUTANE STORAGE OPERATION WITH ONE 12,000 GALLON STORAGE TANK

## PERMIT UNIT REQUIREMENTS

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1. Equipment shall be maintained and operated vapor tight (no detectable VOC emissions) so that there is no leakage of n-butane or isobutane to the atmosphere prior to use in extruders. [District NSR Rule and District Rules 4623, 4.1.1 and 4682, 5.2.1] 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-334-2-10

**EXPIRATION DATE:** 01/31/2024

**EQUIPMENT DESCRIPTION:**

EAST BUILDING RESIN TRANSFER AND STORAGE OPERATION WITH RAILCAR UNLOADING; RECLAIM RECEIVING LINE FROM S-334-6; SIX STORAGE SILOS, FOUR DRYERS, EIGHT DAY BINS (EACH STORAGE SILO, DRYER, AND DAY BIN HAVE ONE PELLET RECEIVER); TEN VACUUM PUMPS WITH INLINE FILTER; AND FOUR PELLET RECEIVERS SERVING SHEET EXTRUDERS LISTED ON S-334-3, S-334-11, AND S-334-15

## 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. All resins beads shall be transferred via closed piping network operating under negative pressure. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The inlet of each vacuum pump shall be served by an inline filter. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Resin throughput to the storage silos shall not exceed 540,000 lb/day or 73,013,856 lb/yr. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Resin throughput to the pellet receivers at extruder inlets shall not exceed 199,104 lb/day or 72,672,960 lb/yr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Particulate matter (PM-10) emissions shall not exceed 0.008 lb PM10/1,000 lb resin. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Permittee shall maintain accurate daily and annual records of process throughput from silos, day bins, dryers, and pellet receivers at extruder inlets. Records shall be kept for a period of five years and made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The inline filter(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. The inline filter(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Material removed from the inline filter(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If 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
12. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Inline filter(s) shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced 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.

13. Records of inline filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-334-3-13

**EXPIRATION DATE:** 01/31/2024

**EQUIPMENT DESCRIPTION:**

FOAMED PLASTIC EXTRUSION OPERATION #S1 INCLUDING ONE BLENDER AND ENCLOSED EXTRUDER DIE VENTED TO 40,000 SCFM CONTROLLED ENVIRONMENT EQUIPMENT CORPORATION REGENERATIVE THERMAL OXIDIZER SHARED WITH PERMITS S-334-6, -7, -8, -11, -13, AND -15

## PERMIT UNIT REQUIREMENTS

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1. Foam extruder die and initial sheet forming and curing section(s) shall be contained within a permanent total enclosure (PTE) achieving 100% capture efficiency which satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). For the purposes of Method 204, the die exit is considered to be the VOC emitting source. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
2. PTE shall operate in a manner to maintain 100% capture efficiency and shall only vent to thermal oxidizer. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
3. Isobutane, n-butane, a combination of these blowing agents, or other District-approved blowing agents, high density polyethylene (HDPE) resin, low density polyethylene (LDPE) resin, polypropylene (PP) resin, and additives shall be the only materials utilized. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Thermal oxidizer destruction efficiency shall be maintained at no less than 97.5% of VOCs collected on a 3-hour average basis, or the outlet concentration shall be no more than 25 ppm as methane on a 3-hour average basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. During normal operation, oxidizer combustion chamber temperature shall be maintained at or above 1500 degrees Fahrenheit or at the temperature required to achieve 97.5% destruction as demonstrated during source testing, as indicated by a permanent, operational temperature indicator. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
6. Permittee shall operate thermal oxidizer with a destruction efficiency of no less than 95% of VOC's collected, by weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
7. When linear thermoplastic polymers of ethylene with densities from 0.94 gram per cubic centimeter or higher or polypropylene are manufactured at the facility, total product emissions shall not exceed 2.4 lb VOC/100 lb total material processed. Total product emissions include process fugitive emissions from permit units S-334-3, '-6, '-7, '-8, '-11, '-13 and '-15, RTO exhaust emissions, warehouse emissions, and emissions transported offsite as blowing agent retained in the final product. Material processed consists of resin and blowing agent. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
8. Average daily facility wide blowing agent use for all foamed plastic extrusion operations shall not exceed 12,240 lb/day calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Emissions from thermal oxidizer stack on a 3-hour average basis, during normal operation, shall not exceed any of the following: NOx - 1 ppmv @ 19% O<sub>2</sub>; SOx - 0.0006 lb/MMBtu; PM10 - 0.0075 lb/MMBtu; CO - 5 ppmv @ 19% O<sub>2</sub>; or VOC 15.25 lbs/hr. [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.



10. Emissions from thermal oxidizer stack during startup shall not exceed any of the following (averaged over the entire startup period): NO<sub>x</sub> - 25 ppmv @ 19% O<sub>2</sub>; SO<sub>x</sub> - 0.0006 lb/MMBtu; PM<sub>10</sub> - 0.0075 lb/MMBtu; CO - 20 ppmv @ 19% O<sub>2</sub>; or VOC 15.25 lbs/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Startup shall be defined as the period of time during which the thermal oxidizer is brought from a shutdown status until the combustion chamber temperature and the temperature of each bed has reached 1,500 °F. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The duration of start-up time shall not exceed 4.0 hours per occurrence. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. The emission control system(s) shall be in operation and emissions shall be minimized insofar as technologically feasible during startup. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Average daily fugitive process VOC emissions (uncaptured process fugitives) from permit units S-334-3, '-6, '-7, '-8, '-11, '-13 and '-15 shall not exceed 135.7 lbs/day [District NSR Rule] Federally Enforceable Through Title V Permit
15. VOC emissions from thermal oxidizer and uncaptured process fugitive emissions shall not exceed 146,840 lbs per rolling 12 month period. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Fugitive process VOC emissions from permit units S-334-3, '-6, '-7, '-8, '-11, '-13 and '-15 shall be determined using the following equation: pounds fugitive process VOC emitted = BAI - (BAD + BAR + WFE); where BAI = pounds blowing agent introduced, BAD = pounds of blowing agent sent to the RTO inlet, BAR = pounds of blowing agent retained in final shipped product, and WFE = pounds of fugitive warehouse VOC emissions (refer to PTO S-334-18). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. Oxidizer exhaust stack shall be equipped with permanent stack sampling provisions consistent with SJVUAPCD Rule 1081, EPA Reference Method 1 and OSHA requirements. [District Rule 1081] Federally Enforceable Through Title V Permit
18. Source testing to demonstrate compliance with VOC emission limit (lb/hr from oxidizer stack) and VOC control efficiency (%) of RTO shall be conducted on an annual basis. If the VOC concentrations fall below the source testing equipment's detection levels such that compliance with the 97.5% control efficiency requirement cannot be demonstrated, the permittee may elect to demonstrate compliance with the RTO outlet VOC limit of 25 ppmv. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
19. Source testing to demonstrate compliance with the 100% capture efficiency of each PTE shall be conducted on an annual basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing whenever there is a significant product change or a change 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. Compliance source testing shall be conducted under conditions representative of normal operation. [District Rule 1081] Federally Enforceable Through Title V Permit
22. 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
23. The following test methods shall be used: stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC (ppmv) - EPA Method 25 or 25A, ARB Method 100 or EPA Method 18, referenced as methane; and PTE capture efficiency - EPA Method 204. [District Rules 1081, 2520, 9.3.2 and 4682, 6.2] Federally Enforceable Through Title V Permit
24. Weight of VOC blowing agent retained in polymeric materials shall be determined using 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 2520, 9.3.2 and 4682, 6.2.4] 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.

25. Source testing shall be conducted by an independent laboratory in accordance with EPA guidelines, and shall be witnessed or authorized by the District. The results of each source test shall be submitted to the District within 60 days. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
26. Thermal oxidizer shall be equipped with a VOC continuous recording emissions monitor (CEM) system that is calibrated and operated in accordance with the requirements of 40 CFR 60, Appendix B, Performance Specification 8. CEM ppm and lb/hr readings shall be calculated as a three-hour and a 1-hour average. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit
27. VOC continuous recording emissions system shall be in operation whenever thermal oxidizer is being used, and shall include the use of a flame ionization detection (FID) analyzer. CEMS shall measure both the inlet and outlet VOC concentrations of the thermal oxidizer and its destruction efficiency shall be continuously monitored and recorded. [District NSR Rule and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. Each 1-hour period in a 3-hour average shall commence on the hour. The 3-hour destruction efficiency average will be compiled from the three most recent 1-hour periods. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
29. Quarterly and annual audits of the VOC CEM system shall be conducted in accordance with 40 CFR 60, Appendix F, Procedure 1, and shall be witnessed or authorized by the District. Audit reports shall be submitted to the District within 60 days of such an audit. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit
30. In the event of a breakdown of the monitoring equipment, the owner shall notify the APCO as soon as possible, but no later than 8 hours after its detection, and shall initiate repairs. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit
31. The owner shall inform the APCO of the intent to shut down any monitoring equipment at least 24 hours prior to the event. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of the following: average fugitive process VOC emissions (lb/day using calculations specified above), type of blowing agent used, amount of blowing agent introduced (BAI), and type and quantity of each product shipped. 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 Rules 1070, 2520, 9.4.2 and 4682, 6.1.1] Federally Enforceable Through Title V Permit
33. The permittee shall maintain a list of all the products manufactured at this facility and each product's associated blowing agent retention rate(s). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
34. The permittee shall maintain records of the date and duration of oxidizer startups and shutdowns. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
35. The permittee shall maintain accurate daily records of the VOC emissions (lb/day from oxidizer stack) and of the key thermal oxidizer operating parameters, including but not limited to the following: stack flow rate (SCFM), oxidizer bed temperature, and VOC destruction efficiency. These records shall be maintained and provided as required by District Rule 1080 and upon request. [District NSR Rule and District Rules 1070, 1080, 2520, 9.4.2 and 4682, 6.1.2] Federally Enforceable Through Title V Permit
36. District shall be notified of the date that polypropylene is introduced as a new raw material in the plant and records kept of calendar days facility processes linear thermoplastic polymers of ethylene with densities from 0.94 gram per cubic centimeter or higher or polypropylene. [District Rules 1070 and 4682] Federally Enforceable Through Title V Permit
37. When linear thermoplastic polymers of ethylene with densities from 0.94 gram per cubic centimeter or higher or polypropylene are manufactured at the facility, monthly records of total product emissions shall be maintained. [District Rules 1070 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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38. Quarterly continuous emission monitoring system reports shall be submitted to SJVUAPCD, as specified in 40 CFR 60, Appendix F, Procedure 1. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit
39. VOC emissions data reduction, record keeping and quarterly reporting shall be performed as described in sections 7 - 11 of Rule 1080. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit
40. A violation of emission standards, as shown by the stack-monitoring system, shall be reported to the Air Pollution Control Officer within 96 hours. [District NSR Rule and District Rule 1080] 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-334-6-9

EXPIRATION DATE: 01/31/2024

SECTION: 28 TOWNSHIP: 18S RANGE: 24E

## EQUIPMENT DESCRIPTION:

FOAMED PLASTIC RECLAIM OPERATION INCLUDING DAVIS STANDARD RECLAIM EXTRUDER, SHREDDER, CRAMMER FEEDER, GRANUTEC GRANULATOR VENTED TO FOUR CYCLONES, FOUR ENCLOSED METAL SILOS, SHARED BAGHOUSE LISTED ON PERMIT S-334-13, AND SHARED OXIDIZER LISTED ON PERMIT S-334-3

## PERMIT UNIT REQUIREMENTS

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1. Only foamed plastic containing high density polyethylene (HDPE), low density polyethylene (LDPE), polypropylene (PP), blowing agent, and additives shall be processed by this equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Grinders, granulators, and any reclaim fluff (ground or shredded plastic such as sheet foam, edge trim, bubble, or plank) feed or storage bins shall only vent to shared baghouse listed on S-334-13. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Silos may receive fluff from grinders and/or shredders listed on S-334-6 and/or S-334-7. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Reclaim extruder vent shall only vent to regenerative thermal oxidizer listed on S-334-3 [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
5. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Permittee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95% by weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
7. The permittee shall maintain the records of the following: amount of material processed and equipment used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rule 4682, 6.1.1] 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-334-7-10

**EXPIRATION DATE:** 01/31/2024

**EQUIPMENT DESCRIPTION:**

FOAMED PLASTIC RECLAIM OPERATION INCLUDING PTI MODEL CPF-3000 RECLAIM EXTRUDER, PNEUMATIC TRIM FEED FROM LAMINATOR S-334-13, SHREDDER, CRAMMER FEEDER VENTED TO TWO CYCLONES, TWO ENCLOSED METAL SILOS, SHARED BAGHOUSE LISTED ON PERMIT S-334-13, AND SHARED OXIDIZER LISTED ON S-334-3

## PERMIT UNIT REQUIREMENTS

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1. Only foamed plastic containing high density polyethylene (HDPE), low density polyethylene (LDPE), polypropylene (PP), blowing agent, and additives shall be processed by this equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Grinders, granulators, and any reclaim fluff (ground or shredded plastic such as sheet foam, edge trim, bubble, or plank) feed or storage bins shall only vent to shared baghouse listed on S-334-13. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Silos may receive fluff from grinders and/or shredders listed on S-334-6 and/or S-334-7. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Reclaim extruder vent shall only vent to regenerative thermal oxidizer listed on S-334-3 [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
5. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Permittee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95% by weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
7. The permittee shall maintain the records of the following: amount of material processed and equipment used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-334-8-3

**EXPIRATION DATE:** 01/31/2024

**EQUIPMENT DESCRIPTION:**

FOAMED PLASTIC PLANK EXTRUSION OPERATION #P1 INCLUDING ONE BLENDER, NRM PACEMAKER III EXTRUDER WITH ENCLOSURE AROUND DIE END OF EXTRUDER LINE VENTED TO SHARED OXIDIZER LISTED ON S-334-3, AND HEATED PLANK AGING ROOM VENTED TO SHARED OXIDIZER LISTED ON S-334-3

## PERMIT UNIT REQUIREMENTS

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1. Foam extruder die and plank forming section(s) shall be contained within a controlled environment enclosure vented to the regenerative thermal oxidizer listed on S-334-3. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
2. Isobutane, n-butane, a combination of these blowing agents, or other District-approved blowing agents, high density polyethylene (HDPE) resin, low density polyethylene (LDPE) resin, polypropylene (PP) resin, and additives shall be the only materials utilized. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Extruded planks shall only be aged within the controlled environment plank aging room which qualifies as a permanent total enclosure (PTE), achieving 100% capture efficiency and satisfies the requirements of 40 C.F.R. Part 51, Appendix M, Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
4. PTE shall operate in a manner to maintain 100% capture efficiency and shall only vent to thermal oxidizer listed on S-334-3. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
5. Average daily facility wide blowing agent use for all foamed plastic extrusion operations shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Permittee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95% by weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
8. Source testing to demonstrate compliance with the 100% capture efficiency of each PTE shall be conducted on an annual basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. The following test method shall be used: PTE capture efficiency - EPA Method 204. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. The permittee shall maintain the following records of operation: amount of material processed, equipment used, and the type of blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rule 4682, 6.1.1] 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-334-10-5

**EXPIRATION DATE:** 01/31/2024

**EQUIPMENT DESCRIPTION:**

RESIN TRANSFER AND STORAGE OPERATION (WEST BUILDING) WITH RAILCAR UNLOADING, RECLAIM RECEIVING, 6 STORAGE SILOS, 2 DRYERS, 4 DAY BINS EACH WITH A PELLET RECEIVER, 4 VACUUM PUMPS, AND PLANK EXTRUDER P1 SERVED BY PELLET RECEIVER(S)

## 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. All resins beads shall be transferred via closed piping network operating under negative pressure. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The inlet of each vacuum pump shall be served by an inline filter. [District NSR Rule] Federally Enforceable Through Title V Permit
4. PM10 emissions shall not exceed 0.036 lb/ton resin bead throughput at each emission point. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emission rate from this transfer operation shall not exceed 5.5 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Permittee shall maintain accurate daily records of process throughput from silos, day bins, dryers, and pellet receivers at extruder inlets. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The inline filter(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. The inline filter(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Material removed from the inline filter(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If 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
11. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Inline filter(s) shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Records of inline filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-334-11-3

**EXPIRATION DATE:** 01/31/2024

**EQUIPMENT DESCRIPTION:**

FOAMED PLASTIC EXTRUSION OPERATION #S3 INCLUDING ONE BLENDER, PERMANENT TOTAL ENCLOSURE FOR EXTRUDER DIE VENTED TO SHARED OXIDIZER LISTED ON PERMIT S-334-3, AND HEATED AGING ROOM, SHARED WITH S-334-15, VENTED TO SHARED OXIDIZER LISTED ON PERMIT S-334-3

## PERMIT UNIT REQUIREMENTS

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1. Foam extruder die and initial sheet forming and curing section(s) shall be contained within a permanent total enclosure (PTE) achieving 100% capture efficiency which satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
2. Extruded sheet measuring 1/2 inch thickness or greater shall only be aged within a controlled environment work in process (WIP) aging room (shared with S-334-15) which qualifies as a permanent total enclosure (PTE), achieving 100% capture efficiency and satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
3. PTE's shall operate in a manner to maintain 100% capture efficiency and shall only vent to thermal oxidizer listed on S-334-3. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
4. Isobutane, n-butane, a combination of these blowing agents, or other District-approved blowing agents, high density polyethylene (HDPE) resin, low density polyethylene (LDPE) resin, polypropylene (PP) resin, and additives shall be the only materials utilized. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Average daily facility wide blowing agent use for all foamed plastic extrusion operations shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Permittee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95%, by weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
8. Source testing to demonstrate compliance with the 100% capture efficiency of each PTE shall be conducted on an annual basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. The following test method shall be used: PTE capture efficiency - EPA Method 204. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. The permittee shall maintain the following records of operation: amount of material processed, equipment used, and the type of blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rule 4682, 6.1.1] 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-334-13-8

**EXPIRATION DATE:** 01/31/2024

**EQUIPMENT DESCRIPTION:**

R-LAM LAMINATOR AND SAWING OPERATION EQUIPPED GRANUTEC GRINDER WITH HIGH-EFFICIENCY K-TRON CYCLONE AND FARR MODEL GS-8 DUST COLLECTOR VENTED TO RTO LISTED ON S-334-3 AND FARR CORPORATION BAGHOUSE SHARED WITH PERMIT UNITS S-334-6 AND '-7 VENTED TO RTO LISTED ON S-334-3

## 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. The baghouses shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. Visible emissions from each baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Baghouses shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the filter bags or cartridges. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Baghouses shall exhaust only to the regenerative thermal oxidizer listed on S-334-3. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Cleaning frequency and duration of each baghouse shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Material removed from dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. PM10 emission rate from the FARR Model GS-8 baghouse shall not exceed 0.08 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The maximum quantity of material collected by the FARR Model GS-8 baghouse shall not exceed 750 lb/day on a monthly average. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM10 emission rate from the Farr Corporation cartridge baghouse shall not exceed 0.05 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. PM10 emission rate from the K-Tron Cyclone shall not exceed 0.4 lb/day. [District Rule 2201]
13. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If 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

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

15. Dust collection system(s) shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Baghouses shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Differential operating pressure shall be monitored and recorded on each day that the baghouses operate. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. Monthly records of daily average of the quantity of material collected in the FARR Model GS-8 baghouse shall be maintained. Records of all maintenance of the baghouses, including all change outs of filter media, shall also be maintained, retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-334-14-2

**EXPIRATION DATE:** 01/31/2024

**EQUIPMENT DESCRIPTION:**

EDGEFOAM MACHINING LINE #2 WITH A SPLICING TABLE, NOTCHING MACHINE, LAMINATOR, V-GROOVE TRIM SAW VENTED TO DUST COLLECTOR, AND CROSS-GROOVE SAW VENTED TO DUST COLLECTOR

## 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. Visible emissions from each dust collector system serving sawing systems shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The Edgefoam Machine line throughput shall not exceed 50,400 linear feet of material per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. PM10 emission rate shall not exceed 1.6 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Permittee shall maintain accurate daily records of Edgefoam Machine line throughput for a period of five years, and shall make such records available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The dust collector(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. The dust collector(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If 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
10. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. 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 the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-334-15-3

EXPIRATION DATE: 01/31/2024

## EQUIPMENT DESCRIPTION:

FOAMED PLASTIC EXTRUSION OPERATION #S4 INCLUDING ONE BLENDER AND ENCLOSED EXTRUDER DIE VENTED TO SHARED OXIDIZER LISTED ON PERMIT S-334-3 AND EXTRUDED SHEET AGING ROOM, SHARED WITH S-334-11, VENTED TO OXIDIZER LISTED ON PERMIT S-334-3

## PERMIT UNIT REQUIREMENTS

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1. Foam extruder die and initial sheet forming and curing section(s) shall be contained within a permanent total enclosure (PTE) achieving 100% capture efficiency which satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
2. Extruded sheet measuring 1/2 inch thickness or greater shall only be aged within a controlled environment work in process (WIP) aging room (shared with S-334-11) which qualifies as a permanent total enclosure (PTE), achieving 100% capture efficiency and satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
3. PTE's shall operate in a manner to maintain 100% capture efficiency and shall only vent to thermal oxidizer listed on S-334-3. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit
4. Isobutane, n-butane, a combination of these blowing agents, or other District-approved blowing agents, high density polyethylene (HDPE) resin, low density polyethylene (LDPE) resin, polypropylene (PP) resin, and additives shall be the only materials utilized. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Average daily facility wide blowing agent use for all foamed plastic extrusion operations shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Permittee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95%, by weight. [District Rule 5.1.2] Federally Enforceable Through Title V Permit
8. Source testing to demonstrate compliance with the 100% capture efficiency of each PTE shall be conducted on an annual basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. The following test method shall be used: PTE capture efficiency - EPA Method 204. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. The permittee shall maintain the following records of operation: amount of material processed, equipment used, and the type of blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rule 4682, 6.1.1] 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-334-16-2

**EXPIRATION DATE:** 01/31/2024

**EQUIPMENT DESCRIPTION:**

36" AUTOSAW OPERATION WITH AUTOSAW SERVED BY A 5 HP MURPHY-ROGERS MODEL MRT-9A DUST COLLECTOR

## 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. The dust collector(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. The dust collector(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If 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
6. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. 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 the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-334-17-2

**EXPIRATION DATE:** 01/31/2024

**EQUIPMENT DESCRIPTION:**

EDGEFOAM OPERATION WITH EDGEFOAM MACHINE #1 SERVED BY A 3 HP SOCO MACHINERY MODEL SDC-2041 DUCT COLLECTOR AND 5 HP QUICKDRAFT MODEL MH557 SCRAP REMOVAL VACUUM 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. The dust collector(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. The dust collector(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If 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
6. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. 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 the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-334-18-2

**EXPIRATION DATE:** 01/31/2024

**EQUIPMENT DESCRIPTION:**

POLYETHYLENE FOAM WIP AND FINISHED GOODS WAREHOUSE

## PERMIT UNIT REQUIREMENTS

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1. Fugitive warehouse VOC emissions from work in process and finished goods storage shall not exceed 125 tons per year. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Fugitive warehouse VOC emissions from all polyethylene and polypropylene operations shall be determined using the following equation: pounds fugitive warehouse VOC emitted = FPS x (BAX - BAS); where FPS = pounds of finished product shipped, BAX = pounds of blowing agent retained per pound of finished product at the end of the extrusion process (winder), and BAS = pounds of blowing agent retained per pound of finished product upon shipment. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. Permittee shall maintain records to document compliance with the fugitive warehouse VOC emission limit. [District Rules 1070 and 2080] 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-334-19-2

**EXPIRATION DATE:** 01/31/2024

**EQUIPMENT DESCRIPTION:**

72" AUTOSAW OPERATION WITH AUTOSAW SERVED BY A 3 HP JET EQUIPMENT DC-1900-3 DUST COLLECTOR WITH MODEL 708639B CARTRIDGE FILTERS

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
2. Visible emissions from the exhaust of the dust collector serving the autosaw operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Dust collector exhaust fan(s) shall be switched on prior to the start-up of autosaw operation. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All filters shall be properly maintained and must be in place during the autosaw operation(s). [District Rule 2201] Federally Enforceable Through Title V Permit
6. Replacement cartridge filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
7. PM10 emissions from the dust collector shall not exceed 0.01 gr/dscf. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
8. Air flow rate to dust collector shall not exceed 1900 scfm. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The dust collector(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [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.

13. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
14. 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 the individual performing the inspection. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

# PERMIT-EXEMPT EQUIPMENT REGISTRATION (PEER)

PEER NO: S-334-1-1

EXPIRATION DATE: 01/31/2023

LEGAL OWNER OR OPERATOR: PREGIS INNOVATIVE PACKAGING INC  
MAILING ADDRESS: 8201 W ELOWIN CT  
VISALIA, CA 93291-9262

FACILITY LOCATION: 8201 W ELOWIN CT  
VISALIA, CA 93291-9262

## EQUIPMENT DESCRIPTION:

4.95 MMBTU/HR AJAX MODEL WRFG-5250 S/N 65216 NATURAL GAS-FIRED BOILER WITH A CLEAVER BROOKS PRO FIRE MODEL NTH050NGX-15S-3L BURNER

## CONDITIONS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. This unit shall be fired exclusively on Public Utilities Commission (PUC) regulated natural gas. [District Rules 4307 and 4801]
5. The unit shall not exceed any of the following emission limits: 30 ppmvd-NOx @ 3% O2 or 0.036 lb-NOx/MMBtu, or 400 ppmvd-CO @ 3% O2. [District Rule 4307]
6. The owner/operator shall monitor, at least once a month, the operational characteristics recommended by the manufacturer and approved by the APCO. [District Rule 4307]
7. The owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4307]
8. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4307]

CONDITIONS CONTINUE ON NEXT PAGE

This PEER remains valid through the expiration date listed above, subject to payment of the annual registration fees and compliance with the PEER conditions and all applicable local, state, and federal regulations. This PEER is valid only within the San Joaquin Valley Air Pollution Control District. Any equipment or operation change may require a PEER application be filed with the District.

**Samir Sheikh**  
Executive Director / APCO

S-334-1-1: 12/10/2018 - VELASCOA : Joint Inspection NOT Required

**Arnaud Marjollet**  
Director of Permit Services



9. In lieu of tuning the unit twice each calendar year, the owner/operator shall monitor the emissions with a portable NOx analyzer at least twice each calendar year and adjust the unit's operating parameters accordingly to assure compliance with the emission limits of this rule. [District Rule 4307]
10. Source testing to measure NOx and CO emissions from this unit shall be conducted no later than the applicable full compliance date for the unit. [District Rule 4307]
11. 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]
12. 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 Rule 4307]
13. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4307]
14. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4307]
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 4307]
16. The owner/operator shall maintain records to verify that the required monitoring of the operational characteristics, and tune-ups or portable NOx analyzing has been performed. [District Rule 4307]
17. Tune-up records shall include: 1) date of tune-up, 2) name of technician performing tune-up, and 3) reason that they are qualified. [District Rule 4307]
18. Portable analyzer records shall include: 1) date of emissions analyzing, 2) results of emissions analyzing, 3) name of technician performing analyzing, 4) make and model of analyzer, 5) date of last calibration of the analyzer, and 6) a description of any adjustments made to the unit's operating parameters for the purposes of assuring compliance. [District Rule 4307]
19. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4307]