

May 13, 2022

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

**Re: Notice of Preliminary Decision – Title V Permit Renewal**  
**Facility Number: N-257**  
**Project Number: N-1204194**

Dear Mr. Crookham:

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

The notice of preliminary decision for this project has been posted on the District's website ([www.valleyair.org](http://www.valleyair.org)). After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

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

Sincerely,



Brian Clements  
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email  
cc: Gerardo Rios, EPA (w/enclosure) via EPS

**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: (861) 392-5500 FAX: (861) 392-5585

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT**

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

**TABLE OF CONTENTS**

---

I.	PROPOSAL.....	2
II.	FACILITY LOCATION .....	2
III.	EQUIPMENT LISTING .....	2
IV.	GENERAL PERMIT TEMPLATE USAGE .....	3
V.	SCOPE OF EPA AND PUBLIC REVIEW .....	3
VI.	FEDERALLY ENFORCEABLE REQUIREMENTS .....	3
VII.	REQUIREMENTS NOT FEDERALLY ENFORCEABLE .....	6
VIII.	PERMIT REQUIREMENTS .....	8
IX.	PERMIT SHIELD .....	13
X.	CALIFORNIA ENVIRONMENTAL QUALITY ACT.....	14
XI.	PERMIT CONDITIONS .....	14

**ATTACHMENTS**

- A. DRAFT RENEWED TITLE V OPERATING PERMIT
- B. PREVIOUS TITLE V OPERATING PERMIT
- C. EQUIPMENT LISTING
- D. RULE 4601 STRINGENCY ANALYSIS

# TITLE V PERMIT RENEWAL EVALUATION

## EPS Foam Container Manufacturing

**Engineer:** Jonah Aiyabei

**Date:** May 13, 2022

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

**Contact Name:** Ron Crookham  
**Phone #:** (209) 333-8088  
**Email:** ron.crookham@dart.biz

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

**Project #:** N-1204194  
**Deemed Complete:** February 5, 2020

---

## I. PROPOSAL

Dart Container Corporation was issued their initial Title V permit in 2004. The permit was most recently renewed in 2016. As required by District Rule 2520, the applicant has applied for a permit renewal. The existing Title V permit will be reviewed and modified to reflect all applicable District and federal rules that have been updated, removed, or added since the last renewal.

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

## II. FACILITY LOCATION

Dart Container Corporation is located at 1400 E Victor Rd in Lodi.

## III. EQUIPMENT LISTING

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

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

No model general permit templates are used in this evaluation.

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

No model general permit templates are used. Therefore, all federally enforceable conditions in this proposed renewed Title V permit will be subject to EPA and public review.

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

##### **A. Rules Updated or Evaluated**

- District Rule 2201, New and Modified Stationary Source Review Rule (amended February 18, 2016 ⇒ amended August 15, 2019)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001 ⇒ amended August 15, 2019)
- District Rule 4306, Boilers, Steam Generators, and Process Heaters – Phase 3 (amended October 16, 2008 ⇒ amended December 17, 2020)
- District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater Than 5.0 MMBtu/hr (amended October 16, 2008 ⇒ amended December 17, 2020)
- District Rule 4601, Architectural Coatings (amended December 17, 2009 ⇒ amended April 16, 2020)
- 40 CFR Part 64, Compliance Assurance Monitoring (adopted October 22, 1997)
- 40 CFR Part 82 Subpart B, Servicing of Motor Vehicle Air Conditioners (amended March 24, 2021)
- 40 CFR Part 82 Subpart F, Recycling and Emissions Reductions (amended April 10, 2020)

##### **B. Rules Removed**

- Fresno County Rule 110, Equipment Breakdown (SIP approved 8/22/1977 ⇒ District resolution to rescind from SIP 2/17/2022)
- Kern County Rule 111, Equipment Breakdown (SIP approved 10/24/1980 ⇒ District resolution to rescind from SIP 2/17/2022)

- Kings County Rule 111, Equipment Breakdown (SIP approved, last amended 6/18/1982 ⇒ District resolution to rescind from SIP 2/17/2022)
- Madera County Rule 113, Equipment Breakdown (SIP approved 11/18/1983 ⇒ District resolution to rescind from SIP 2/17/2022)
- Stanislaus County Rule 110, Equipment Breakdown (SIP approved 6/1/1983 ⇒ District resolution to rescind from SIP 2/17/2022)
- Tulare County Rule 111, Equipment Breakdown (SIP approved 8/22/1977 ⇒ District resolution to rescind from SIP 2/17/2022)

### **C. Rules Added**

No rules have been added since the last renewed Title V permit was issued.

### **D. Rules Not Updated**

- San Joaquin County Rule 110, Equipment Breakdown  
(adopted September 27, 1983 ⇒ SIP approved December 5, 1984)
- District Rule 1070, Inspections  
(amended December 17, 1992)
- District Rule 1080, Stack Monitoring  
(amended December 17, 1992)
- District Rule 1081, Source Sampling  
(amended December 16, 1993)
- District Rule 2010, Permits Required  
(amended December 17, 1992)
- District Rule 2020, Exemptions  
(amended December 18, 2014)
- District Rule 2031, Transfer of Permits  
(amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications  
(amended December 17, 1992)
- District Rule 2080, Conditional Approval  
(amended December 17, 1992)
- District Rule 2410, Prevention of Significant Deterioration  
(adopted June 16, 2011 ⇒ effective November 26, 2012)

- District Rule 4101, Visible Emissions  
(amended February 17, 2005)
- San Joaquin County Rule 401, Visible Emissions  
(SIP approved June 18, 1982)
- District Rule 4201, Particulate Matter Concentration  
(amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment  
(amended December 17, 1992)
- District Rule 4305, Boilers, Steam Generators, and Process Heaters – Phase 2  
(amended August 21, 2003)
- District Rule 4607, Graphic Arts and Paper, Film, Foil and Fabric Coatings  
(amended December 18, 2008)
- District Rule 4682, Polystyrene, Polyethylene, and Polypropylene Products Manufacturing  
(amended December 15, 2011)
- District Rule 8011, Fugitive Dust General Requirements  
(amended August 19, 2004)
- District Rule 8021, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Construction, Demolition, Excavation, and Extraction Activities  
(amended August 19, 2004)
- District Rule 8031, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Handling and Storage of Bulk Materials  
(amended August 19, 2004)
- District Rule 8041, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Carryout and Trackout  
(amended August 19, 2004)
- District Rule 8051, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Open Areas  
(amended August 19, 2004)
- District Rule 8061, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Paved and Unpaved Roads  
(amended August 19, 2004)

- District Rule 8071, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Unpaved Vehicle/Equipment Areas (amended September 16, 2004)
- 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (amended February 16, 2012)
- 40 CFR Part 61, Subpart M, National Emissions Standards for Asbestos (amended July 20, 2004)
- 40 CFR Part 68, Chemical Accident Prevention Provisions (amended April 9, 2004)

## VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

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

For this facility, the following rules are not federally enforceable:

### A. Rules Updated or Evaluated

No rules were updated or evaluated.

### B. Rules Added

No rules were added.

### C. Rules Not Updated

#### 1. District Rule 4102 – Nuisance

This rule prevents the discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such person or the public or which cause or have a natural tendency to cause injury or damage to business or property.

The following conditions are based on this rule and are therefore not federally enforceable through Title V:

Permit Unit	Condition #
N-257-0-4	42
N-257-6-5	1

**2. District Rule 1100 – Equipment Breakdown**

This rule defines a breakdown condition and the procedures to follow if one occurs. The corrective action, the issuance of an emergency variance, and the reporting requirements are also specified.

The following conditions are jointly based on this rule and San Joaquin County Rule 110. These conditions are therefore not federally enforceable through this rule:

Permit Unit	Condition #s
N-257-0-4	1 and 2

**3. District Rule 1160 – Emission Statements**

The purpose of this rule is to provide the District with an accurate accounting of emissions from significant sources with which the District and ARB can compile an accurate inventory.

The following condition is based on this rule and is therefore not federally enforceable through Title V:

Permit Unit	Condition #
N-257-0-4	3

**4. District Rule 2040 – Applications**

The purpose of this rule is to explain the procedures for filing, denying, and appealing the denial of applications for an Authority to Construct or a Permit to Operate.

The following condition is based on this rule and is therefore not federally enforceable through Title V:

Permit Unit	Condition #
N-257-0-4	7



## VIII. PERMIT REQUIREMENTS

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

### 1. **Fresno County Rule 110, Kern County Rule 111, Kings County Rule 111, Madera County Rule 113, Stanislaus County Rule 110, and Tulare County Rule 111 – Equipment Breakdown**

In accordance with EPA's State Implementation Plan (SIP) Call, on February 17, 2022, the District rescinded Fresno County Rule 110, Kern County Rule 111, Kings County Rule 111, Madera County Rule 113, Stanislaus County Rule 110, and Tulare County Rule 111 from the San Joaquin Valley SIP.

Therefore, Conditions 1, 2, and 39 on the proposed draft renewed Permit N-257-0-4 have been modified to remove all references to the rescinded county breakdown rules.

### 2. **District Rule 2201 – New and Modified Stationary Source Review Rule**

District Rule 2201 has been amended since this Title V permit was last renewed. However, the requirements of this rule are only triggered at the time the source undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit. The updated requirements of this rule are therefore not applicable at this time.

### 3. **District Rule 2520 – Federally Mandated Operating Permits**

This rule has been amended since this Title V permit was last renewed, but the last amended version of the rule is not SIP approved. Additionally, the amendments to this rule do not have any effect on current permit requirements. However, greenhouse gas emissions will be addressed under Rule 2520 during this renewal.

#### Greenhouse Gas Discussion

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40 CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40 CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

**4. District Rule 4306 – Boilers, Steam Generators, and Process Heaters – Phase 3**

This rule limits emissions of oxides of nitrogen (NO<sub>x</sub>) and carbon monoxide (CO) from boilers, steam generators, and process heaters. The rule is applicable to gaseous or liquid fuel-fired boilers, steam generators, and process heaters with a heat input greater than 5 million Btu per hour. The rule was recently amended on December 17, 2020.

The amended rule requires boilers, steam generators, and process heaters to meet the applicable NO<sub>x</sub> and CO limits listed in Table 2 on or after December 31, 2023 or December 31, 2029, depending on the category of the unit. The facility must submit an emission control plan and apply for Authority to Construct permits to modify their units subject to this rule by May 1, 2022 or May 1, 2028, to comply with the revised emission limits.

The boilers, steam generators, and process heaters at this facility comply with the current emission limit requirements of Rule 4306 listed in Table 1. Table 2 requirements are not in effect yet. Therefore, no changes to the permits are required at this time since the units and their current permits comply with all current Rule 4306 requirements. An Authority to Construct and emission control plan will be submitted in the future to address the Table 2 emission limits, as applicable to each unit.

**5. District Rule 4320 – Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater Than 5.0 MMBtu/hr**

This rule limits emissions of oxides of nitrogen (NO<sub>x</sub>) and carbon monoxide (CO), oxides of sulfur (SO<sub>2</sub>), and particulate matter 10 microns or less (PM<sub>10</sub>) from boilers, steam generators, and process heaters. The rule is applicable to gaseous or liquid fuel-fired boilers, steam generators, and process heaters with a heat input greater than 5 million Btu per hour. The rule was recently amended on December 17, 2020.

The amended rule requires boilers, steam generators, and process heaters to meet the applicable NO<sub>x</sub> limits listed in Table 2 on or after December 31, 2023. The facility must submit an emission control plan and apply for Authority to Construct permits to modify their permit for units subject to this rule by December 31, 2021 to comply with the revised emission limits.

The boilers, steam generators, and process heaters at this facility comply with the current emission limit requirements of Rule 4320 listed in Table 1. Table 2 requirements are not in effect yet. Therefore, no changes to the permits are required at this time since they are in compliance with all current Rule 4320 requirements. An Authority to Construct and emission control plan will be

submitted in the future to address the Table 2 emission limits, as applicable to each unit.

## **6. District Rule 4601 – Architectural Coatings**

District Rule 4601 was last amended on April 16, 2020. The current version of the rule is not yet SIP-approved. However, as shown in the stringency analysis in Attachment D, the current version of the rule is at least as stringent as the SIP-approved version (amended December 17, 2009).

The purpose of this rule is to limit VOC emissions from architectural coatings. This rule specifies architectural coatings storage, cleanup, and labeling requirements.

Section 5.1 requires that no person shall manufacture, blend, or repackage for use within the District; or supply, sell, market, or offer for sale within the District; or solicit for application or apply within the District any architectural coating or colorant with a VOC content in excess of the corresponding limit specified in Table 1 or Table 2, after the specified effective date in Table 1 or Table 2.

Sections 5.2 and 5.3 provide the following clarifications:

- Applicability clarifications for coatings meeting the definitions of multiple specialty coating categories or recommended for use in multiple specialty coating categories
- Provisions for the sell-through and use of coatings and colorants that have already been manufactured prior to the effective date for the amended limits

Section 5.4 requires that all architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays, or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.

Sections 5.5, 5.6, and 5.7 provide the following clarifications:

- No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in Table 1.

- For any coating that does not meet any of the definitions for the specialty coatings categories listed in Table 1, the VOC content limit shall be determined by classifying the coating as flat or nonflat, based on its gloss, and the corresponding flat or nonflat VOC limit in Table 1 shall apply.
- No person within the District shall, at the point of sale of any architectural coating subject to subsection 5.1, add to such coating any colorant that contains VOCs in excess of the corresponding applicable VOC limit specified in Table 2. The point of sale includes retail outlets that add colorant to a coating container to obtain a specific color.

Section 6.0 specifies administrative requirements including those related to labeling, reporting, and test methods. The requirements are primarily directed at manufacturers but all facilities must comply indirectly and/or as applicable.

The following conditions on the draft renewed permit are a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Condition #s
N-257-0-4	23 through 25

## 7. 40 CFR Part 64 - Compliance Assurance Monitoring

### §64.2 – Applicability

This regulation requires compliance assurance monitoring (CAM) for units that meet the following three criteria:

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

The permit units at this facility consist of a boiler, diesel-fired IC engines, wine/distilled spirits tanks, and a wastewater sump.

#### a. N-257-2

This permit unit has no emission limits for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, or CO. The unit has a limit for VOC emissions and is equipped with an add-con control device for VOC emissions. As determined in previous evaluations, the unit's the pre-control potential to emit for VOC is greater than the major

source threshold both before and after control. The unit is therefore subject to CAM for VOC.

The following conditions on the draft renewed permit are a mechanism to ensure continued compliance with the CAM requirements:

Permit Unit	Condition #s
N-257-2-8	51 through 55

b. N-257-4 and N-257-5

These permit units have emission limits for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC. The units have no add-on control devices for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, or CO, and are therefore not subject to CAM for any of these pollutants.

The units have add-on control devices (flue gas recirculations) for NO<sub>x</sub>. However, as determined in previous evaluations, the pre-control potential to emit for each unit is less than the major source threshold of 20,000 lb/year. Therefore, neither unit is subject to CAM.

c. N-257-6

This permit unit does not have emission limits of any pollutants, and is therefore not subject to CAM.

d. N-257-7

This permit unit has no emission limits for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, or CO. The unit has a limit for VOC emissions. As determined in previous evaluations, the unit's the pre-control potential to emit for VOC is less than the major source threshold. The unit is therefore not subject to CAM.

**8. 40 CFR Part 82 Subpart B – Servicing of Motor Vehicle Air Conditioners**

The purpose of 40 CFR Part 82 Subpart B is to implement section 609 of the Clean Air Act, as amended regarding the servicing of motor vehicle air conditioners (MVACs), and to implement section 608 of the Clean Air Act regarding certain servicing, maintenance, repair and disposal of air conditioners in MVACs and MVAC-like appliances.

These regulations apply to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

The amendments to this subpart did not have any effect on the current permit requirements and will therefore not be addressed further in this evaluation.

The following condition on the draft renewed permit is a mechanism to ensure compliance with the requirements of this subpart:

Permit Unit	Condition #
N-257-0-4	28

**9. 40 CFR Part 82 Subpart F – Recycling and Emissions Reductions**

The purpose of 40 CFR Part 82 Subpart F is to reduce emissions of class I and class II refrigerants and their substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the service, maintenance, repair, and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I and class II ODS in accordance with Title VI of the Clean Air Act.

These regulations apply to any person servicing, maintaining, or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

The amendments to this subpart did not have any effect on the current permit requirements and will therefore not be addressed further in this evaluation.

The following condition on the draft renewed permit is a mechanism to ensure compliance with the requirements of this subpart:

Permit Unit	Condition #
N-257-0-4	27

**IX. PERMIT SHIELD**

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

**A. Requirements Addressed by Model General Permit Templates**

No model general permit templates are used in this evaluation.

## **B. Requirements not Addressed by Model General Permit Templates**

This Title V permit renewal application does not include any proposals for new permit shields or modifications to any pre-existing permit shields. The proposed renewed Title V permit therefore does not include any new or modified permit shields.

## **X. CALIFORNIA ENVIRONMENTAL QUALITY ACT**

The purpose of the Title V permit renewal is to update the permit to ensure that any changes to regulations since the issuance of the initial Title V permit, or the most recent renewal of the Title V permit, are incorporated as permit requirements.

Per CEQA Statutes §21080.24 and CEQA Guidelines §15281, the issuance, modification, amendment, or renewal of any permit by an air pollution control district or air quality management district pursuant to Title V is exempt from CEQA, unless the issuance, modification, amendment, or renewal authorizes a physical or operational change to a source or facility. Since this Title V permit renewal does not authorize any physical or operational changes to the source or facility, it is exempt from CEQA.

## **XI. PERMIT CONDITIONS**

The draft renewed Title V operating permit is included as Attachment A.

### **ATTACHMENTS**

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Equipment Listing
- D. Rule 4601 Stringency Analysis

---

# ATTACHMENT A

Draft Renewed Title V Operating Permit

---



# San Joaquin Valley Air Pollution Control District

FACILITY: N-257-0-4

EXPIRATION DATE: 04/30/2021

## FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1 and San Joaquin County Rule 110] 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 San Joaquin County Rule 110] 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]
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. 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]
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: DART CONTAINER CORPORATION

Location: 1400 E VICTOR RD, LODI, CA 95240

N-257-0-4 : Mar 30 2022 9:07AM -- AIYABEJ

10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

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

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. No person shall manufacture, blend, or repackage for use within the District; or supply, sell, market, or offer for sale within the District; or solicit for application or apply within the District any architectural coating or colorant with a VOC content in excess of the corresponding limit specified in Table 1 or Table 2, after the specified effective date in Table 1 or Table 2 of District Rule 4601 (4/16/20). [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to District Rule 4601 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 applicable administrative requirements specified Section 6.0 of District Rule 4601. [District Rule 4601, 6.0] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit

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

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with the permit conditions in the Title V permit shall be deemed compliance with the following outdated SIP requirements: San Joaquin County Rules 401 and 110. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin on December 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. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. Facility-wide daily NO<sub>x</sub> emissions shall not exceed 150 pounds in any one day. Facility-wide daily NO<sub>x</sub> emissions from the 14.65 MMBtu/hr Boiler (N-257-4) and the 29.3 MMBtu/hr Boiler (N-257-5) shall be calculated as follows: Daily NO<sub>x</sub> Emissions = [(0.011 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0512 x Daily Fuel Oil Combusted (MMBtu per day))] + [(0.008 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0512 x Daily Fuel Oil Combusted (MMBtu per day))]. [District NSR Rule] Federally Enforceable Through Title V Permit

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

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

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

DRAFT

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-257-2-8

**EXPIRATION DATE:** 04/30/2021

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

27. Source testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
28. Annual source testing shall be conducted to verify compliance with the total product emissions limit (2.4 lb-VOC/100 lb-EPS processed), the daily Manufacturing VOC emission limit (161.1 lb/day), the overall pentane emission reductions from the bead handling systems (50% or more by weight), and the boilers (N-257-4 and N-257-5) control efficiency (95% or more by weight). [District Rule 2201 and 4682] Federally Enforceable Through Title V Permit
29. P1, P2, and P3 shall be determined annually for each EPS material. The samples shall be taken as follows: P1 - take 3 samples from a bead box; P2 - take 3 samples for each density product; P3 - take 3 samples for each density product. An average of the test results would establish a value for respective parameter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. P1, P2 and P3 for each EPS material shall be re-established, at least once every five years, or when pentane content in raw beads exceeds the pre-established limit. For determining P1, P2, and P3, the samples shall be taken as follows: P1 - take 6 samples from manufacturer lot #1, take 6 samples from manufacturer lot #2, take 3 samples from manufacturer lot #3; P2 - take 15 samples for each density product; P3 - take 3 samples for each density product. An average of the test results would establish a value for respective parameter. [District Rule 4682] Federally Enforceable Through Title V Permit
31. P1, P2 and P3 shall be determined using SCAQMD Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternate method as approved by the District, EPA and CARB. [District Rule 4682] Federally Enforceable Through Title V Permit
32. For processing multiple types of EPS materials in a given day, the daily Manufacturing VOC emissions shall be determined by taking the sum of the numbers obtained for each type of processing material using the following equation:  $[(P1 - P3) - (P1 - P2)(CE)](\text{Processing Rate (lb-EPS/day)})$ . [District Rule 2201] Federally Enforceable Through Title V Permit
33. For processing a single type of EPS material in a given day, the daily Manufacturing VOC emissions shall be determined using the following equation:  $[(P1 - P3)(\text{Processing Rate (lb/day)}) - (\text{CEMS data, lb-VOC/day})(CE)]$ . [District Rule 2201] Federally Enforceable Through Title V Permit
34. Source testing to verify the overall pentane emission reductions from the bead handling systems and the minimum control efficiency of the boilers (N-257-4 and N-257-5) shall be conducted annually. The influent concentration from the vapor recovery system to the boilers and effluent concentration from the boiler stacks shall be measured using EPA Test Method 25 or 25A. These concentrations shall be converted to mass emission rates (lb-VOC/hr, lb-VOC/day) for determining overall pentane reductions, and the control efficiency of the boilers. [District Rule 1081 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
35. The overall pentane emissions reductions from the bead handling systems (%) shall be computed using the following equation:  $(100)\{(Mi - Mo)/Mi\}\{Mi/(E1+E2)\}$ , where  $Mi$  = mass emission rate at the inlet of boilers (lb-VOC/day),  $Mo$  = mass emission rate at boilers stack (lb-VOC/day),  $E1$  = (Processing Rate)(P1 - P2) lb-VOC/day for the material processed through the Rodman pre-expanders,  $E2$  = (Processing Rate)(P1 - P2) lb-VOC/day for the material processed through the Hirsch pre-expanders. [District Rule 1081 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
36. The operator shall verify the accuracy of the CEMS during each source test. This system shall be calibrated and operated in accordance with the requirements of 40 CFR Part 51. [District Rules 1081, 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
37. The permittee shall utilize continuous emissions monitor system (CEMS) to measure and record VOC concentration and volumetric airflow (cfm) of the laden air stream from the vapor recovery system. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

DRAFT

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-257-4-8

**EXPIRATION DATE:** 04/30/2021

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. Emissions rates when this unit is firing on fuel oil #2 shall not exceed any of the following limits: 40.0 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0512 lb-NO<sub>x</sub>/MMBtu, 0.0016 lb-SO<sub>x</sub>/MMBtu, 0.015 lb-PM<sub>10</sub>/MMBtu, 100 ppmv CO @ 3% O<sub>2</sub> or 0.078 lb-CO/MMBtu, or 0.0045 lb-VOC/MMBtu. [District NSR Rule and Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
17. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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

DRAFT

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-257-5-9

**EXPIRATION DATE:** 04/30/2021

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. The SO<sub>x</sub> emissions, while firing on #2 fuel oil, shall not exceed 0.0016 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM<sub>10</sub> emissions, while firing on #2 fuel oil, shall not exceed 0.015 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Operational characteristics recommended by the manufacturer and approved by the District shall be monitored on at least a monthly basis. [District Rule 4320, 5.7.2] Federally Enforceable Through Title V Permit
18. The permittee shall monitor and record the stack concentration of 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 analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. If either the 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, 4306 and 4320] Federally Enforceable Through Title V Permit
20. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operation or conditions specified in the Permit-to-Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent by volume 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
22. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
25. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
29. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
32. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. The fuel oil sulfur content shall be determined utilizing ASTM method D-6920-03, ASTM method D-5453-99 or a District approved equivalent. [District Rule 4320] Federally Enforceable Through Title V Permit
34. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
35. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
36. An annual record of the cumulative number of hours of operation on #2 fuel oil and of the reason for this operation shall be kept. The record shall be updated at least monthly. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
37. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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

DRAFT



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-257-6-5

**EXPIRATION DATE:** 04/30/2021

**EQUIPMENT DESCRIPTION:**

121,680 SQ FT FINAL STYROFOAM PRODUCT STORAGE WAREHOUSE

## PERMIT UNIT REQUIREMENTS

---

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 4102]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-257-7-2

**EXPIRATION DATE:** 04/30/2021

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

---

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

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

---

# ATTACHMENT B

Previous Title V Operating Permit

---

# Permit to Operate

**FACILITY:** N-257

**EXPIRATION DATE:** 04/30/2021

**LEGAL OWNER OR OPERATOR:**

DART CONTAINER CORPORATION

**MAILING ADDRESS:**

1400 E VICTOR RD  
LODI, CA 95240

**FACILITY LOCATION:**

1400 E VICTOR RD  
LODI, CA 95240

**FACILITY DESCRIPTION:**

STYROFOAM CONTAINERS 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

**Brian Clements**  
Director of Permit Services

# San Joaquin Valley Air Pollution Control District

**FACILITY:** N-257-0-3

**EXPIRATION DATE:** 04/30/2021

## **FACILITY-WIDE REQUIREMENTS**

---

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 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] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: DART CONTAINER CORPORATION  
Location: 1400 E VICTOR RD, LODI, CA 95240  
N-257-0-3 : Feb 18 2022 3:51PM -- AIYABEUJ

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. 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. On November 30, 2004, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin December 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. Facility-wide daily NO<sub>x</sub> emissions shall not exceed 150 pounds in any one day. Facility-wide daily NO<sub>x</sub> emissions from the 14.65 MMBtu/hr Boiler (N-257-4) and the 29.3 MMBtu/hr Boiler (N-257-5) shall be calculated as follows: Daily NO<sub>x</sub> Emissions = [(0.011 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0512 x Daily Fuel Oil Combusted (MMBtu per day))] + [(0.008 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0512 x Daily Fuel Oil Combusted (MMBtu per day))]. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Facility-wide daily VOC emissions excluding the warehouse emissions shall not exceed 250 pounds in any one day. Facility-wide daily VOC emissions from the 14.65 MMBtu/hr Boiler (N-257-4) and the 29.3 MMBtu/hr Boiler (N-257-5) shall be calculated as follows: Daily VOC Emissions = [(0.0042 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0045 x Daily Fuel Oil Combusted (MMBtu per day))] + [(0.0042 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0045 x Daily Fuel Oil Combusted (MMBtu per day))]. [District NSR Rule] Federally Enforceable Through Title V Permit
45. The permittee shall maintain daily records of the calculated daily facility-wide NO<sub>x</sub> and VOC emissions. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
46. Records of the daily facility-wide NO<sub>x</sub> and VOC emissions shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-257-2-5

**EXPIRATION DATE:** 04/30/2021

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

---

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

27. Source testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
28. Annual source testing shall be conducted to verify compliance with the total product emissions limit (2.4 lb-VOC/100 lb-EPS processed), the daily Manufacturing VOC emission limit (161.1 lb/day), the overall pentane emission reductions from the bead handling systems (50% or more by weight), and the boilers (N-257-4 and N-257-5) control efficiency (95% or more by weight). [District Rule 2201 and 4682] Federally Enforceable Through Title V Permit
29. P1, P2, and P3 shall be determined annually for each EPS material. The samples shall be taken as follows: P1 - take 3 samples from a bead box; P2 - take 3 samples for each density product; P3 - take 3 samples for each density product. An average of the test results would establish a value for respective parameter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. P1, P2 and P3 for each EPS material shall be re-established, at least once every five years, or when pentane content in raw beads exceeds the pre-established limit. For determining P1, P2, and P3, the samples shall be taken as follows: P1 - take 6 samples from manufacturer lot #1, take 6 samples from manufacturer lot #2, take 3 samples from manufacturer lot #3; P2 - take 15 samples for each density product; P3 - take 3 samples for each density product. An average of the test results would establish a value for respective parameter. [District Rule 4682] Federally Enforceable Through Title V Permit
31. P1, P2 and P3 shall be determined using SCAQMD Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternate method as approved by the District, EPA and CARB. [District Rule 4682] Federally Enforceable Through Title V Permit
32. For processing multiple types of EPS materials in a given day, the daily Manufacturing VOC emissions shall be determined by taking the sum of the numbers obtained for each type of processing material using the following equation:  $[(P1 - P3) - (P1 - P2)(CE)](\text{Processing Rate (lb-EPS/day)})$ . [District Rule 2201] Federally Enforceable Through Title V Permit
33. For processing a single type of EPS material in a given day, the daily Manufacturing VOC emissions shall be determined using the following equation:  $[(P1 - P3)(\text{Processing Rate (lb/day)}) - (\text{CEMS data, lb-VOC/day})(CE)]$ . [District Rule 2201] Federally Enforceable Through Title V Permit
34. Source testing to verify the overall pentane emission reductions from the bead handling systems and the minimum control efficiency of the boilers (N-257-4 and N-257-5) shall be conducted annually. The influent concentration from the vapor recovery system to the boilers and effluent concentration from the boiler stacks shall be measured using EPA Test Method 25 or 25A. These concentrations shall be converted to mass emission rates (lb-VOC/hr, lb-VOC/day) for determining overall pentane reductions, and the control efficiency of the boilers. [District Rule 1081 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
35. The overall pentane emissions reductions from the bead handling systems (%) shall be computed using the following equation:  $(100)\{(Mi - Mo)/Mi\} \{Mi/(E1+E2)\}$ , where  $Mi$  = mass emission rate at the inlet of boilers (lb-VOC/day),  $Mo$  = mass emission rate at boilers stack (lb-VOC/day),  $E1$  = (Processing Rate)(P1 - P2) lb-VOC/day for the material processed through the Rodman pre-expanders,  $E2$  = (Processing Rate)(P1 - P2) lb-VOC/day for the material processed through the Hirsch pre-expanders. [District Rule 1081 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
36. The operator shall verify the accuracy of the CEMS during each source test. This system shall be calibrated and operated in accordance with the requirements of 40 CFR Part 51. [District Rules 1081, 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
37. The permittee shall utilize continuous emissions monitor system (CEMS) to measure and record VOC concentration and volumetric airflow (cfm) of the laden air stream from the vapor recovery system. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-257-4-7

**EXPIRATION DATE:** 04/30/2021

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

---

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. Emissions rates when this unit is firing on fuel oil #2 shall not exceed any of the following limits: 40.0 ppmv NOx @ 3% O2 or 0.0512 lb-NOx/MMBtu, 0.0016 lb-SOx/MMBtu, 0.015 lb-PM10/MMBtu, 100 ppmv CO @ 3% O2 or 0.078 lb-CO/MMBtu, or 0.0045 lb-VOC/MMBtu. [District NSR Rule and Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
17. 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
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. Stack gas oxygen (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
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. The permittee shall monitor and record the stack concentration of 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
23. 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-257-5-8

**EXPIRATION DATE:** 04/30/2021

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

---

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. The SO<sub>x</sub> emissions, while firing on #2 fuel oil, shall not exceed 0.0016 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM<sub>10</sub> emissions, while firing on #2 fuel oil, shall not exceed 0.015 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Operational characteristics recommended by the manufacturer and approved by the District shall be monitored on at least a monthly basis. [District Rule 4320, 5.7.2] Federally Enforceable Through Title V Permit
18. The permittee shall monitor and record the stack concentration of 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 analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. If either the 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, 4306 and 4320] Federally Enforceable Through Title V Permit
20. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operation or conditions specified in the Permit-to-Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent by volume 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
22. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
25. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
29. Source testing to measure NO<sub>x</sub> emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
32. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. The fuel oil sulfur content shall be determined utilizing ASTM method D-6920-03, ASTM method D-5453-99 or a District approved equivalent. [District Rule 4320] Federally Enforceable Through Title V Permit
34. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]
35. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
36. An annual record of the cumulative number of hours of operation on #2 fuel oil and of the reason for this operation shall be kept. The record shall be updated at least monthly. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
37. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-257-6-4

**EXPIRATION DATE:** 04/30/2021

**EQUIPMENT DESCRIPTION:**

121,680 SQ FT FINAL STYROFOAM PRODUCT STORAGE WAREHOUSE

## PERMIT UNIT REQUIREMENTS

---

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 4102]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-257-7-1

**EXPIRATION DATE:** 04/30/2021

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

---

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

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

---

# ATTACHMENT C

Equipment Listing

---

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

<b>DART CONTAINER CORPORATION</b> 1400 E VICTOR RD LODI, CA 95240	FAC # STATUS: TELEPHONE:	<b>N 257</b> <b>A</b> <b>2093338088</b>	TYPE: TOXIC ID:	<b>TitleV</b> <b>20358</b>	EXPIRE ON: AREA: INSP. DATE:	04/30/2021 1 / 04/22
---	--------------------------------	---	--------------------	-------------------------------	------------------------------------	----------------------------

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-257-2-5	541 HP ELECTRIC MOTOR RATING	3020-01 F	1	731.00	731.00	A	EXPANDABLE POLYSTYRENE (EPS) PROCESSING OPERATION: ENCLOSED BEAD DUMPING OPERATION CONSISTING OF A HOPPER AND DUMPER SYSTEM, ONE HOLDING TANK AND ONE BLENDER, FOUR RODMAN PRE-EXPANDERS WITH CASCADE DRYERS ALL VENTED TO THE VAPOR RECOVERY SYSTEM; ENCLOSED BEAD DUMPING OPERATION CONSISTING OF A HOPPER AND DUMPER SYSTEM, ONE HOLDING TANK, TWO FEEDERS, TWO FEED/WEIGH BINS, TWO HIRSCH PRE-EXPANDERS WITH VENTS AND DELUMPERS, AND TWO BLADDER TANKS ALL VENTED TO THE VAPOR RECOVERY SYSTEM; AND EIGHTY-SEVEN MOLDING MACHINES. THE VAPOR RECOVERY SYSTEM WITH AN IN-LINE CYCLONE SEPARATOR IS VENTED TO THE BOILERS PERMITTED UNDER N-257-4 AND N-257-5.
N-257-4-7	14.65 MMBTU/HR BOILER	3020-02 G	1	980.00	980.00	A	14.65 MMBTU/HR CLEAVER BROOKS BOILER (MODEL CB 600-350-150) WITH A CLEAVER BROOKS MODEL CB-NTI LOW-NOX BURNER AND FLUE GAS RECIRCULATION
N-257-5-8	29.3 MMBTU/HR BOILER	3020-02 H	1	1,238.00	1,238.00	A	29.3 MMBTU/HR CLEAVER BROOKS BOILER MODEL #CB 400-700-150 WITH A CLEAVER BROOKS MODEL #CB-NTI-9PPM ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION
N-257-6-4	miscellaneous	3020-06	1	128.00	128.00	A	121,680 SQ FT FINAL STYROFOAM PRODUCT STORAGE WAREHOUSE
N-257-7-1	60 electric HP	3020-01 C	1	239.00	239.00	A	GRAPHIC ARTS PRINTING OPERATION CONSISTING OF FOUR DART MODEL 250 AND EIGHT DART MODEL 200 FLEXOGRAPHIC/OFFSET LITHOGRAPHIC PRINTERS

Number of Facilities Reported: 1

---

# ATTACHMENT D

Rule 4601 Stringency Analysis

---



**District Rule 4601 Stringency Analysis**  
**Comparison of Current (Non-SIP) Version (4/16/20) to SIP Version (12/17/09)**

Category	SIP Version	Current (Non-SIP) Version	Conclusion
Purpose	The purpose of this rule is to limit VOC emissions from architectural coatings. This rule specifies architectural coatings storage, cleanup, and labeling requirements.	The purpose of this rule is to limit VOC emissions from architectural coatings. This rule specifies architectural coatings storage, cleanup, and labeling requirements.	<b>The current version of the rule is equivalent to the SIP version because the purpose is the same.</b>
Applicability	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.	This rule is applicable to any person who supplies, markets, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.	<b>The current version of the rule is equivalent to the SIP version because the applicability is the same.</b>
Exemptions	<p>(4.1) The provisions of this rule shall not apply to:</p> <ul style="list-style-type: none"> <li>- (4.1.1) Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</li> <li>- (4.1.2) Any aerosol coating product.</li> </ul> <p>(4.2) With the exception of Section 6.2, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057quarts) or less.</p>	<p>(4.1) The provisions of this rule shall not apply to:</p> <ul style="list-style-type: none"> <li>- (4.1.1) Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</li> <li>- (4.1.2) Any aerosol coating product.</li> </ul> <p>(4.2) With the exception of Section 6.2 and Section 4.3, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057quarts) or less, provided the following requirements are met:</p> <ul style="list-style-type: none"> <li>- (4.2.1) The coating container is not bundled together with other containers of the same specific coating category (listed in Table 1) to be sold as a unit that exceeds one liter (1.057 quart), excluding containers packed together for shipping to a retail outlet, and</li> <li>- (4.2.2) The label or any other product literature does not suggest combining multiple containers of the same specific category (listed in Table 1) so that the combination exceeds one liter (1.057 quart).</li> </ul> <p>(4.3) On and after sixty days following the effective date of EPA final rulemaking that the conditions described in Clean Air Act Sections 172(c)(9) and 182(c)(9) have occurred in the San Joaquin Valley regarding the 2008 8-hour Ozone National Ambient Air Quality Standard, the categories of coatings listed below shall no longer be exempt from the provisions of Table 1 of this rule when sold in containers having</p>	<b>The current version of the rule is more stringent than the SIP version because more conditions have been added to the small volume exemption, and this exemption could be completely eliminated in the future for a large number of coating categories.</b>

**District Rule 4601 Stringency Analysis  
Comparison of Current (Non-SIP) Version (4/16/20) to SIP Version (12/17/09)**

Category	SIP Version	Current (Non-SIP) Version	Conclusion
		<p>capacities of one liter (1.057 quarts) or less:</p> <ul style="list-style-type: none"> <li>- (4.3.1) Bituminous Roof Coatings;</li> <li>- (4.3.2) Flat Coatings that are sold in containers having capacities greater than eight fluid ounces;</li> <li>- (4.3.3) Magnesite Cement Coatings;</li> <li>- (4.3.4) Multi-Color Coatings;</li> <li>- (4.3.5) Nonflat Coatings that are sold in containers having capacities greater than eight fluid ounces;</li> <li>- (4.3.6) Pre-Treatment Wash Primers;</li> <li>- (4.3.7) Reactive Penetrating Sealers;</li> <li>- (4.3.8) Shellacs (Clear and opaque);</li> <li>- (4.3.9) Stone Consolidants;</li> <li>- (4.3.10) Swimming Pool Coatings;</li> <li>- (4.3.11) Tub and Tile Refinishing Coatings;</li> <li>- (4.3.12) Wood Coatings, including Lacquers, Varnishes, and Sanding Sealers; and</li> <li>- 4.3.13 Wood Preservatives.</li> </ul> <p>(4.4) Colorant added at the factory or at the worksite is not subject to the VOC limits in Table 2. In addition, containers of colorant sold at the point of sale for use in the field or on a job site are also not subject to the VOC limit in Table 2.</p>	

**District Rule 4601 Stringency Analysis  
Comparison of Current (Non-SIP) Version (4/16/20) to SIP Version (12/17/09)**

Category	SIP Version	Current (Non-SIP) Version	Conclusion
VOC Content Limits	<p>(5.1) Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, or offer for sale within the District; or solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards 1 or the Table of Standards 2, after the specified effective date in the Table of Standards 1 or the Table of Standards 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.</p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>- The limits in Table of Standards 1 were in effect only until 12/31/2010.</li> <li>- The first tier of limits in Table of Standards 2 were in effect only until 12/31/2011.</li> </ul>	<p>(5.1) VOC Content Limits: Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, market or offer for sale within the District; or solicit for application or apply within the District any architectural coating or colorant with a VOC content in excess of the corresponding limit specified in Table 1 or Table 2, after the specified effective date in Table 1 or Table 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.</p>	<p><b>As shown in the attached VOC Content Limits Comparison table, the current version of the rule is more stringent than the SIP version in 15 coating categories and is equivalent in the rest of the categories. The current version of the rule is therefore more stringent than the SIP version.</b></p>

**District Rule 4601 Stringency Analysis  
Comparison of Current (Non-SIP) Version (4/16/20) to SIP Version (12/17/09)**

Category	SIP Version	Current (Non-SIP) Version	Conclusion
<p>Most Restrictive VOC Content Limit</p>	<p>(5.2) If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in the Table of Standards 1 or the Table of Standards 2, then that coating is not required to meet the VOC limits for Flat, Nonflat, or Nonflat – High Gloss coatings, but is required to meet the VOC limit for the applicable specialty coating listed in the Table of Standards 1 or the Table of Standards 2. Effective on and after January 1, 2011, with the exception of the specialty coating categories specified in Sections 5.2.3.2, 5.2.3.3, 5.2.3.5 through 5.2.3.9, and 5.2.3.14 through 5.2.3.18, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 2, the most restrictive (or lowest) VOC content limit shall apply. This requirement applies to: usage recommendations that appear anywhere on the coating container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf.</p> <p>5.2.3.1 Lacquer coatings (including lacquer sanding sealers)</p> <p>5.2.3.2 Metallic pigmented coatings</p> <p>5.2.3.3 Shellacs</p> <p>5.2.3.4 Fire-retardant coatings</p> <p>5.2.3.5 Pretreatment wash primers</p> <p>5.2.3.6 Industrial maintenance coatings</p> <p>5.2.3.7 Low-solids coatings</p> <p>5.2.3.8 Wood preservatives</p> <p>5.2.3.9 High temperature coatings</p> <p>5.2.3.10 Temperature-indicator safety coatings</p> <p>5.2.3.11 Antenna coatings</p> <p>5.2.3.12 Antifouling coatings</p> <p>5.2.3.13 Flow coatings</p> <p>5.2.3.14 Bituminous roof primers</p> <p>5.2.3.15 Specialty primers, sealers and undercoaters</p> <p>5.2.3.16 Aluminum roof coatings</p> <p>5.2.3.17 Zinc-rich primers</p> <p>5.2.3.18 Wood Coatings</p>	<p>(5.2) If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in Table 1, then that coating is not required to meet the VOC limits for Flat or Nonflat coatings, but is required to meet the VOC limit for the applicable specialty coating listed in Table 1. With the exception of the specialty coating categories specified in Sections 5.2.1 through 5.2.12, if a coating is recommended for use in more than one of the specialty coating categories listed in Table 1, then the most restrictive (or lowest) VOC content limit shall apply. This requirement applies to: usage recommendations that appear anywhere on the coating container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf.</p> <p>5.2.1 Metallic pigmented coatings;</p> <p>5.2.2 Shellacs;</p> <p>5.2.3 Pretreatment wash primers;</p> <p>5.2.4 Industrial maintenance coatings;</p> <p>5.2.5 Low-solids coatings;</p> <p>5.2.6 Wood preservatives;</p> <p>5.2.7 High temperature coatings;</p> <p>5.2.8 Bituminous roof primers;</p> <p>5.2.9 Specialty primers, sealers and undercoaters;</p> <p>5.2.10 Aluminum roof coatings;</p> <p>5.2.11 Zinc-rich primers; and</p> <p>5.2.12 Wood Coatings.</p>	<p><b>The current version of the rule is more stringent than the SIP version because there are fewer coatings exempt from the most restrictive VOC limit requirement.</b></p>

**District Rule 4601 Stringency Analysis**  
**Comparison of Current (Non-SIP) Version (4/16/20) to SIP Version (12/17/09)**

Category	SIP Version	Current (Non-SIP) Version	Conclusion
Sell-Through of Coatings	(5.3) A coating manufactured prior to the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2, and that complied with the standards in effect at the time the coating was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2 may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date code required by Section 6.1.1.	(5.3.1) A coating manufactured prior to January 1, 2022, may be sold, supplied, or offered for sale for up to three years after January 1, 2022. In addition, a coating manufactured before January 1, 2022 may be applied at any time, both before and after January 1, 2022, so long as the coating complied with the standards in effect at the time the coating was manufactured. This subsection 5.3.1 does not apply to any coating that does not display the date or date-code required by subsection 6.1.1.  (5.3.2) A colorant manufactured prior to January 1, 2022, may be sold, supplied, or offered for sale for up to three years after January 1, 2022. In addition, a colorant manufactured before January 1, 2022 may be applied at any time, both before and after January 1, 2022, so long as the colorant complied with the standards in effect at the time the colorant was manufactured. This subsection 5.3.2 does not apply to any colorant that does not display the date or date-code required by subsection 6.1.1.	<b>The current version of the rule is equivalent to the SIP version because the sell-through provision is the same.</b>
Painting Practices	(5.4) All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.	(5.4) All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.	<b>The current version of the rule is equivalent to the SIP version because the painting practices requirement is the same.</b>
Thinning	(5.5) No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards 1 or the Table of Standards 2.	(5.5) No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in Table 1.	<b>The current version of the rule is equivalent to the SIP version because the thinning requirement is the same.</b>

**District Rule 4601 Stringency Analysis**  
**Comparison of Current (Non-SIP) Version (4/16/20) to SIP Version (12/17/09)**

Category	SIP Version	Current (Non-SIP) Version	Conclusion
Coatings not Listed in the Applicable VOC Content Limits Table	(5.7) For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards 1 or the Table of Standards 2, the VOC content limit shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat – High Gloss coating, based on its gloss, and the corresponding Flat, Nonflat, or Nonflat – High Gloss VOC limit in the Table of Standards 1 or the Table of Standards 2 shall apply.	(5.6) For any coating that does not meet any of the definitions for the specialty coatings categories listed in Table 1, the VOC content limit shall be determined by classifying the coating as Flat or Nonflat, based on its gloss, and the corresponding Flat or Nonflat VOC limit in Table 1 shall apply.	<b>The current version of the rule is equivalent to the SIP version because the provision regarding unlisted coatings is the same.</b>
Colorants	N/A	(5.7) No person within the District shall, at the point of sale of any architectural coating subject to subsection 5.1, add to such coating any colorant that contains VOCs in excess of the corresponding applicable VOC limit specified in Table 2. The point of sale includes retail outlets that add colorant to a coating container to obtain a specific color.	<b>The current version of the rule is more stringent than the SIP version because this is a new/additional requirement.</b>
Labeling Requirements	<p>(6.1) Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections 6.1.1 through 6.1.14 on the coating container (or label) in which the coating is sold or distributed.</p> <p>(6.1.1) Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</p>	<p>(6.1) Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections 6.1.1 through 6.1.12 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</p>	<b>The current version of the rule is equivalent to the SIP version because the labeling requirements are generally the same in the applicable categories.</b>

**District Rule 4601 Stringency Analysis  
Comparison of Current (Non-SIP) Version (4/16/20) to SIP Version (12/17/09)**

Category	SIP Version	Current (Non-SIP) Version	Conclusion
	<p>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</p> <p>6.1.3.2 VOC Content, as determined from actual formulation data; or</p> <p>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</p> <p>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.1.4 Faux Finishing Coatings: Effective January 1, 2011, the labels of all clear topcoat Faux Finishing coatings shall prominently display the statement "This product can only be sold or used as part of a Faux Finishing coating system".</p> <p>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.5.1 through 6.1.5.3.</p> <p>6.1.5.1 "For industrial use only"</p> <p>6.1.5.2 "For professional use only"</p> <p>6.1.5.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.6 Clear Brushing Lacquers: The labels of all clear brushing</p>	<p>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</p> <p>6.1.3.2 VOC Content, as determined from actual formulation data; or</p> <p>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</p> <p>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing. VOC Content shall be determined as defined in subsections 3.72, 3.73, and 3.74.</p> <p>6.1.4 Faux Finishing Coatings: The labels of all clear topcoat Faux Finishing coatings shall prominently display the statement "This product can only be sold or used as part of a Faux Finishing coating system".</p> <p>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.5.1 through 6.1.5.2.</p> <p>6.1.5.1 "For industrial use only"</p> <p>6.1.5.2 "For professional use only"</p>	

**District Rule 4601 Stringency Analysis  
Comparison of Current (Non-SIP) Version (4/16/20) to SIP Version (12/17/09)**

Category	SIP Version	Current (Non-SIP) Version	Conclusion
	<p>lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed." (Category deleted effective January 1, 2011.)</p> <p>6.1.7 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only".</p> <p>6.1.8 Specialty Primers, Sealers and Undercoaters: Effective until December 31, 2010, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the descriptions listed in Section 6.1.8.1 through 6.1.8.5. Effective on and after January 1, 2011, the labels of all specialty primers, sealers, and undercoaters shall prominently display one or more of the descriptions listed in Sections 6.1.8.1 through 6.1.8.3. On and after January 1, 2011, Sections 6.1.8.4 and 6.1.8.5 will be no longer effective.</p> <p>6.1.8.1 For fire-damaged substrates.</p> <p>6.1.8.2 For smoke-damaged substrates.</p> <p>6.1.8.3 For water-damaged substrates.</p> <p>6.1.8.4 For excessively chalky substrates.</p> <p>6.1.8.5 For blocking stains.</p> <p>6.1.9 Quick Dry Enamels: The labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time. (Category deleted effective January 1, 2011.)</p> <p>6.1.10 Reactive Penetrating Sealers: Effective January 1, 2011, the labels of all Reactive Penetrating Sealers shall prominently display the statement "Reactive Penetrating Sealer."</p> <p>6.1.11 Stone Consolidants: Effective January 1, 2011, the labels of all Stone Consolidants shall prominently display the statement "Stone Consolidant - For Professional Use Only."</p>	<p>6.1.6 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only".</p> <p>6.1.7 Specialty Primers, Sealers and Undercoaters: The labels of all specialty primers, sealers, and undercoaters shall prominently display the statement "Specialty Primer, Sealer, Undercoater".</p> <p>6.1.8 Reactive Penetrating Sealers: The labels of all Reactive Penetrating Sealers shall prominently display the statement "Reactive Penetrating Sealer."</p> <p>6.1.9 Stone Consolidants: The labels of all Stone Consolidants shall prominently display the statement "Stone Consolidant - For Professional Use Only."</p>	



**District Rule 4601 Stringency Analysis  
Comparison of Current (Non-SIP) Version (4/16/20) to SIP Version (12/17/09)**

Category	SIP Version	Current (Non-SIP) Version	Conclusion
	<p>6.1.12 Nonflat– High Gloss Coatings: The labels of all Nonflat – high gloss coatings shall prominently display the words “High Gloss.”</p> <p>6.1.13 Wood Coatings: Effective January 1, 2011, the labels of all Wood Coatings shall prominently display the statement “For Wood Substrates Only.”</p> <p>6.1.14 Zinc Rich Primers: Effective January 1, 2011, the labels of all Zinc Rich Primers shall prominently display one or more of the following descriptions listed in Section 6.1.14.1 through 6.1.14.3.          6.1.14.1 “For industrial use only”          6.1.14.2 “For professional use only”          6.1.14.3 “Not for residential use” or “Not intended for residential use”</p>	<p>6.1.10 Wood Coatings: The labels of all Wood Coatings shall prominently display the statement “For Wood Substrates Only.”</p> <p>6.1.11 Zinc Rich Primers: The labels of all Zinc Rich Primers shall prominently display the statement “For professional use only.”</p> <p>6.1.12 Colorants: Effective January 1, 2022, each manufacturer of any colorant subject to this rule shall display the information listed in subsections 6.1.12.1 and 6.1.12.2 on the container (or label) in which the colorant is sold or distributed.</p> <p>6.1.12.1 Date Code: The date the colorant was manufactured, or a date code representing the date, shall be indicated on the label, lid, or bottom of the container. If the manufacturer uses a date code for any colorant, the manufacturer shall file an explanation of each code with the APCO.</p> <p>6.1.12.2 VOC Content: Each container of any colorant subject to this rule shall display one of the following values in grams of VOC per liter of colorant:</p> <p>6.1.12.2.1 Maximum VOC Content as determined from all potential product formulations; or</p> <p>6.1.12.2.2 VOC Content as determined from actual formulation data; or</p> <p>6.1.12.2.3 VOC Content as</p>	

**District Rule 4601 Stringency Analysis  
Comparison of Current (Non-SIP) Version (4/16/20) to SIP Version (12/17/09)**

Category	SIP Version	Current (Non-SIP) Version	Conclusion
		<p>determined using the test methods in subsection 6.3.2.</p> <p>If the colorant contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing. VOC Content shall be determined as defined in subsections 3.72, 3.73, and 3.74.</p>	
<p><b>Reporting Requirements</b></p>	<p>The reporting requirements specified in Sections 6.2.1 through 6.2.6 shall apply until December 31, 2010.</p> <p>(6.2.7) Effective on and after January 1, 2011, Sales Data: All sales data listed in Sections 6.2.7.1 through 6.2.7.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of the ARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17, California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections 6.2.7.1 through 6.2.7.14:</p> <ul style="list-style-type: none"> <li>- (6.2.7.1) the name and mailing address of the manufacturer;</li> <li>- (6.2.7.2) the name, address and telephone number of a contact person;</li> <li>- (6.2.7.3) the name of the coating product as it appears on the label and the applicable coating category;</li> <li>- (6.2.7.4) whether the product is marketed for interior or exterior use or both;</li> <li>- (6.2.7.5) the number of gallons sold in California in containers greater than one liter (1.057 quart)</li> </ul>	<p>The reporting requirements specified in Sections 6.2.1 through 6.2.6 shall apply until December 31, 2010.</p> <p>(6.2.7) Effective on and after January 1, 2011, Sales Data: All sales data listed in Sections 6.2.7.1 through 6.2.7.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of the ARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17, California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections 6.2.7.1 through 6.2.7.14:</p> <ul style="list-style-type: none"> <li>- (6.2.7.1) the name and mailing address of the manufacturer;</li> <li>- (6.2.7.2) the name, address and telephone number of a contact person;</li> <li>- (6.2.7.3) the name of the coating product as it appears on the label and the applicable coating category;</li> <li>- (6.2.7.4) whether the product is marketed for interior or exterior use or both;</li> <li>- (6.2.7.5) the number of gallons sold in California in containers greater than one liter (1.057 quart)</li> </ul>	<p><b>The current version of the rule is equivalent to the SIP version because the reporting requirements are the same.</b></p>

**District Rule 4601 Stringency Analysis  
Comparison of Current (Non-SIP) Version (4/16/20) to SIP Version (12/17/09)**

Category	SIP Version	Current (Non-SIP) Version	Conclusion
	<p>and equal to or less than one liter (1.057 quart);</p> <ul style="list-style-type: none"> <li>- (6.2.7.6) the VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed;</li> <li>- (6.2.7.7) the names and CAS numbers of the VOC constituents in the product;</li> <li>- (6.2.7.8) the names and CAS numbers of any compounds in the product specifically exempted from the VOC definition;</li> <li>- (6.2.7.9) whether the product is marketed as solvent-borne, waterborne, or 100% solids;</li> <li>- (6.2.7.10) description of resin or binder in the product;</li> <li>- (6.2.7.11) whether the coating is a single-component or multi-component product;</li> <li>- (6.2.7.12) the density of the product in pounds per gallon;</li> <li>- (6.2.7.13) the percent by weight of: solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC definition; and</li> <li>- (6.2.7.14) the percent by volume of: solids, water, and any compounds in the product specifically exempted from the VOC definition.</li> </ul>	<p>and equal to or less than one liter (1.057 quart);</p> <ul style="list-style-type: none"> <li>- (6.2.7.6) the VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed;</li> <li>- (6.2.7.7) the names and CAS numbers of the VOC constituents in the product;</li> <li>- (6.2.7.8) the names and CAS numbers of any compounds in the product specifically exempted from the VOC definition;</li> <li>- (6.2.7.9) whether the product is marketed as solvent-borne, waterborne, or 100% solids;</li> <li>- (6.2.7.10) description of resin or binder in the product;</li> <li>- (6.2.7.11) whether the coating is a single-component or multi-component product;</li> <li>- (6.2.7.12) the density of the product in pounds per gallon;</li> <li>- (6.2.7.13) the percent by weight of: solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC definition; and</li> <li>- (6.2.7.14) the percent by volume of: solids, water, and any compounds in the product specifically exempted from the VOC definition.</li> </ul>	
<b>Test Methods</b>	The test methods listed in Sections 6.3.1 through 6.3.28 shall be used to demonstrate compliance with this rule. Alternate equivalent test methods may be used provided the test methods have been approved by the APCO and EPA.	The test methods listed in Sections 6.3.1 through 6.3.35 shall be used to demonstrate compliance with this rule. Alternate equivalent test methods may be used provided the test methods have been approved by the APCO and EPA.	<b>The test methods have been updated as necessary to ensure that there is a method of compliance demonstration for each limit. These changes/updates have no effect on the stringency of the rule.</b>

**Overall Conclusion**

The current version of the rule is more stringent than the SIP version with regard to exemptions, VOC content limits, most restrictive VOC content limit, and colorants; and is equivalent to the SIP

version with regard to all other rule requirements. The current version of the rule is therefore more stringent than the SIP version.

**Attachment**

VOC Content Limits Comparisons Table

**VOC Content Limits Comparisons Table**

Coating Category	SIP Version (12/17/2009)	Current/Non-SIP Version (4/16/2020)		Conclusion
	(Effective on & After 1/1/2012) (grams/liter)	Current (grams/liter)	Effective on & After 1/1/2022 (grams/liter)	
Flat Coatings	50	50	50	E
Nonflat Coatings	100	100	50	MS
Nonflat - High Gloss Coatings	150	-	-	MS
<b>Specialty Coatings</b>				
Aluminum Roof Coatings	400	400	100	MS
Basement Specialty Coatings	400	400	400	E
Bituminous Roof Coatings	50	50	50	E
Bituminous Roof Primers	350	350	350	E
Bond Breakers	350	350	350	E
Building Envelope Coatings	N/A	-	50	MS
Concrete Curing Compounds	350	350	350	E
Concrete/Masonry Sealers	100	100	100	E
Driveway Sealers	50	50	50	E
Dry Fog Coatings	150	150	50	MS
Faux Finishing Coatings	350	350	350	E
Fire Resistive Coatings	350	350	150	MS
Floor Coatings	100	100	50	MS
Form-Release Compounds	250	250	100	MS
Graphic Arts Coatings (Sign Paints)	500	500	500	E
High Temperature Coatings	420	420	420	E
Industrial Maintenance Coatings	250	250	250	E
Low Solids Coatings	120	120	120	E
Magnesite Cement Coatings	450	450	450	E
Mastic Texture Coatings	100	100	100	E
Metallic Pigmented Coatings	500	500	500	E
Multi-Color Coatings	250	250	250	E
Pre-Treatment Wash Primers	420	420	420	E
Primers, Sealers, and Undercoaters	100	100	100	E
Reactive Penetrating Sealers	350	350	350	E
Recycled Coatings	250	250	250	E
Roof Coatings	50	50	50	E
Rust Preventative Coatings	250	250	250	E
Shellacs: Clear	730	730	730	E
Shellacs: Opaque	550	550	550	E
Specialty Primers, Sealers, and Undercoat	100	100	100	E
Stains	250	250	100	MS
Interior Stains	N/A	-	250	E
Stone Consolidants	450	450	450	E
Swimming Pool Coatings	340	340	340	E
Tile and Stone Sealers	N/A	-	100	MS
Traffic Marking Coatings	100	100	100	E
Tub and Tile Refinish Coatings	420	420	420	E
Waterproofing Membranes	250	250	100	MS
Wood Coatings	275	275	275	E
Wood Preservatives	350	350	350	E
Zinc-Rich Primers	340	340	340	E
<b>Colorants</b>				
Architectural Coatings, excluding Industrial	N/A	N/A	50	MS
Solvent Based Industrial Maintenance Coat	N/A	N/A	600	MS
Waterborne Industrial Maintenance Coatir	N/A	N/A	50	MS
Wood Coatings	N/A	N/A	600	MS

E = Equivalent; MS = More Stringent