

February 13, 2023

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

**Re: Notice of Final Action - Title V Permit Renewal**  
**Facility Number: C-36**  
**Project Number: C-1203826**


Dear Mr. Berard:

The District has issued the Final Renewed Title V Permit for Pactiv, LLC (see enclosure). The preliminary decision for this project was made on December 20, 2022. All comments received during the preliminary decision for this project have been addressed by the District. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be posted on the District's website ([www.valleyair.org](http://www.valleyair.org)).

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

Sincerely,



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

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**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT**

Final Title V Permit Renewal Evaluation  
Pactiv, LLC  
C-36

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**TITLE V PERMIT RENEWAL EVALUATION**  
**Polystyrene Foam Manufacturing**

**Engineer:** Christian Bisher  
**Date:** February 13, 2023

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

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

**Responsible Official:** Chris Berard  
**Title:** Plant Manager

**Project # :** C-1203826  
**Deemed Complete:** November 2, 2020

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**I. PROPOSAL**

Pactiv, LLC was issued a Title V permit on December 21, 2016. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to ensure 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**

C-36 is located at 5370 E Home Ave in Fresno, CA.

### **III. EQUIPMENT LISTING**

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

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

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

#### **A. Template SJV-UM-0-3 Facility Wide Umbrella**

The applicant has requested to utilize template No. SJV-UM-0-3, Facility Wide Umbrella. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

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

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

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

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

- Conditions 1 through 40 of the requirements for permit unit C-36-0-4.

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

#### **Rules Addressed by General Permit Template**

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

- District Rule 2520, Federally Mandated Operating Permits, (amended June 21, 2001 ⇒ amended August 15, 2019)

- District Rule 4601, Architectural Coatings (amended December 17, 2009 ⇒ amended April 16, 2020)
- 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 Reduction (amended April 10, 2020)

## **B. Rules Added or Removed**

There are no applicable rules that were added or removed since the last Title V renewal.

## **C. Rules Not Updated**

- 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, Section 7.0 (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 8011, Fugitive Dust General Requirements (amended August 19, 2004)
- District Rule 8021, Construction, Demolition Excavation, Extraction, and Other Earthmoving Activities (amended August 19, 2004)
- District Rule 8031, Bulk Materials (amended August 19, 2004)
- District Rule 8041, Carryout and Trackout (amended August 19, 2004)
- District Rule 8051, Open Areas (amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads (amended August 19, 2004)

- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (amended September 16, 2004)
- 40 CFR Part 61, Subpart M, National Emission Standards for Asbestos (amended July 20, 2004)

## **Rules Not Addressed by General Permit Template**

### **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 2301, Emissions Reduction Credit Banking (amended January 19, 2012 ⇒ amended August 15, 2019)
- 40 CFR Part 64, Compliance Assurance Monitoring (amended October 22, 1997)
- 40 CFR Part 68, Chemical Accident Prevention Provisions (amended December 19, 2019)

### **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**

There are no applicable rules that were added or removed since the last Title V renewal.

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

- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 2410, Prevention of Significant Deterioration (effective October 26, 2012)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4202, Particulate Matter Emission Rate (amended December 17, 1992)
- District Rule 4623, Storage of Organic Liquids (amended May 19, 2005)
- District Rule 4662, Organic Solvent Degreasing Operations (amended September 20, 2007)
- District Rule 4682, Polystyrene, Polyethylene, and Polypropylene Products Manufacturing (amended December 15, 2011)

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

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

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

### **Rules Addressed by General Permit Template**

- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (amended November 18, 1992)
- District Rule 2040, Applications (amended December 17, 1992)

## Rules Not Addressed by General Permit Template

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

## VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit or most recent renewal of the Title V permit. Rules that have not been updated but are being evaluated for compliance purposes will also be addressed here.

### A. District Rule 2201 – New and Modified Stationary Source Review Rule (NSR)

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.

### B. District Rule 2301 – Emissions Reduction Credit Banking

District Rule 2301 has been amended since this Title V permit was last renewed. However, the amendments to this rule were administrative in nature, relating only to the notification procedures for Title V permit modifications that are required to go through a public notice. Several of the permits at this facility contain Rule 2301 rule references to enforce the validity of ERCs previously issued at this site. Continued compliance with the requirements of this rule will be ensured by the permit conditions as outlined in the following table.



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

**C. District Rule 2520 – Federally Mandated Operating Permits**

District Rule 2520 has been amended since the last Title V permit renewal was issued for this facility, but the last amended version is not SIP approved. The amendments to this rule were administrative in nature, relating only to the notification procedures for Title V permit modifications that are required to go through a public notice. However, compliance with the requirements of this rule will be ensured with the permit conditions on the facility-wide permit.

Additionally, 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.

**D. District Rule 4601 – Architectural Coatings**

District Rule 4601 has been amended since the last Title V permit renewal was issued for this facility, but the last amended version is not SIP approved.

However, compliance with the requirements of this rule will be ensured with the permit conditions on the facility-wide permit listed below:

Permit	Conditions	Applicability
C-36-0-4	23, 24, 25	District Rule 4601

**E. 40 CFR Part 64 – Compliance Assurance Monitoring (CAM)**

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

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

Pollutant	Major Source Threshold (lb/year)
NO <sub>x</sub>	20,000
SO <sub>x</sub>	140,000
PM <sub>10</sub>	140,000
CO	200,000
VOC	20,000

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

Unit C-36-1 emits only particulate matter but is not subject to CAM for PM<sub>10</sub> since there is not a PM<sub>10</sub> emission limit. Therefore, CAM is not triggered by this unit.

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

C-36-3: POLYSTYRENE FOAM EXTRUSION LINE #2 CONSISTING OF #EX-20 PRIMARY EXTRUDER, #EX-21 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-11 WITH

SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

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

C-36-5: THERMOFORMER LINE #3 CONSISTING OF A THERMOFORMER, TRIM PRESS, GRINDER AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

C-36-6: THERMOFORMER LINE #4 CONSISTING OF GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE FLUFF SILOS DESCRIBED IN C-36-18

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

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

C-36-9: THERMOFORMER LINE #7 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

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

C-36-11: THERMOFORMER LINE #9 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN PERMIT C-36-18

C-36-12: THERMOFORMER LINE #10 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

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

C-36-14: #EX-40 RECLAIM EXTRUDER #1 SERVED BY A 42-IN CYCLONE WITH FILTER (SHARED WITH C-36-19), SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-19), AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17

C-36-18: SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A DUST COLLECTION SYSTEM, CONSISTING OF A 5,500 CFM TORIT MODEL 4DF16 DUST COLLECTOR IN PARALLEL WITH A 5,500 CFM DONALDSON TORIT MODEL DFO 4-16 DUST COLLECTOR, AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

C-36-19: #EX-50 RECLAIM EXTRUDER #2 SERVED BY A 42-IN CYCLONE WITH FILTER (SHARED WITH C-36-14), SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-14), AND THEN THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17

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

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

C-36-22: #EX-70 RECLAIM EXTRUDER #3 SERVED BY A 42-IN CYCLONE WITH FILTER, SMOG HOG MODEL SH20 EP, AND A THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING SIX RECLAIM SILOS DESCRIBED IN PTO C-36-17

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

units' potential to emit after control is greater than the Major Source threshold, monitoring data must be collected every 15 minutes. The automated temperature logger records the temperature at least once every 15 minutes.

These units are all controlled by the thermal oxidizer listed on final permit C-36-2-14. The following requirements will be retained on permit unit C-36-2-14.

Permit	Condition	Applicability
C-36-2-14	20, 21	Federal Regulation 40 CFR Part 64

The following conditions will be added to permit unit C-36-2-14 to satisfy the requirements of CAM:

*22. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V permit*

*23. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V permit*

*24. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V permit*

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

Permit unit '-14 has a 42-in cyclone with a bag filter to control fluff as it arrives at the infeed hopper from the fluff silos and an electrostatic precipitator (ESP) to control any particulate matter at the extruder exhaust. Since CAM is applicable on an emission unit basis, the infeed PM<sub>10</sub> emission unit served by the 42-in cyclone with bag filter will be evaluated separately from the post-extrusion PM<sub>10</sub> emission unit served by the ESP.

42-inch Cyclone with Filter:

The pre-control potential to emit is calculated below.

Controlled PM<sub>10</sub>EF = Pre-controlled PM<sub>10</sub>EF x (1 – Control Efficiency)

Pre-controlled PM<sub>10</sub>EF = Controlled PM<sub>10</sub>EF / (1 – Control Efficiency)

Controlled PM<sub>10</sub>EF = 0.0486 lb-PM<sub>10</sub>/1,000 lb-product (Projects  
C-1084211 and C-1092244)

Control Efficiency = 99% (Project C-920306)

Throughput = 36,000 lb-product/day (permit C-36-14-8)

Pre-controlled PM<sub>10</sub>EF = 0.0486 lb-PM<sub>10</sub>/1,000 lb-product / (1 – 0.99)  
= 4.86 lb-PM<sub>10</sub>/1,000 lb-product

PE<sub>Pre-controlled</sub> = Pre-controlled PM<sub>10</sub>EF x Throughput x 365 day/year  
= 4.86 lb-PM<sub>10</sub>/1,000 lb-product x 36,000 lb-product/day  
x 365 day/year  
= 4.86 lb-PM<sub>10</sub>/1,000 lb-product x 36 1,000 lb-product/day  
x 365 day/year  
= 63,860 lb-PM<sub>10</sub>/year

Since the pre-control potential to emit is less than the PM<sub>10</sub> major source threshold, CAM is not required for the infeed PM<sub>10</sub> emissions unit.

#### Smog Hog Model SH-20-PE ESP:

The Smog Hog ESP controls PM<sub>10</sub> emissions from the reclaim extruder exhaust. Permit unit C-36-14 does not have an emission limit for the PM<sub>10</sub> emitted from the reclaim extruder exhaust. Therefore, CAM is not required for this emission unit.

- d) C-36-19: #EX-50 RECLAIM EXTRUDER #2 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-14) AND THEN THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17

Permit unit '-19 has the same configuration as permit unit '-14 with respect to particulate matter control. Similarly, the infeed PM<sub>10</sub> emission unit served by the 42-in cyclone with bag filter will be evaluated separately from the post-extrusion PM<sub>10</sub> emission unit served by the ESP.

#### 42-inch Cyclone with Filter:

Permit unit C-36-19 has a smaller daily polystyrene process limit (28,800 lb-product/day) than permit unit C-36-14 with all other parameters the same. Since CAM was not required for permit unit C-36-14 infeed PM<sub>10</sub> emissions,

CAM will similarly not be required for infeed PM<sub>10</sub> emissions for permit unit C-36-19.

Smog Hog Model SH-20-PE:

The Smog Hog electrostatic precipitator controls PM<sub>10</sub> emissions from the reclaim extruder exhaust. Permit unit C-36-19 does not have an emission limit for the PM<sub>10</sub> emitted from the reclaim extruder exhaust. Therefore, CAM is not required for this emission unit.

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

Permit unit '-22 has a MAC Equipment Model #39AVRC14 dust collector to control fluff particulate matter as it arrives at the infeed hopper from the fluff silos and an electrostatic precipitator (ESP) to control any particulate matter at the extruder exhaust. Since CAM is applicable on an emission unit basis, the infeed PM<sub>10</sub> emission unit served by the MAC dust collector will be evaluated separately from the post-extrusion PM<sub>10</sub> emission unit served by the ESP.

MAC Equipment Model 39AVRC14:

The pre-controlled potential to emit will be recalculated using this permit unit's larger daily throughput limit of 48,000 lb-product/day. All other parameters remain the same.

$$\begin{aligned} PE_{\text{Pre-controlled}} &= \text{Pre-controlled PM}_{10}\text{EF} \times \text{Throughput} \times 365 \text{ day/year} \\ &= 4.86 \text{ lb-PM}_{10}/1,000 \text{ lb-product} \times 48,000 \text{ lb-product/day} \\ &\quad \times 365 \text{ day/year} \\ &= 4.86 \text{ lb-PM}_{10}/1,000 \text{ lb-product} \times 48 \text{ 1,000 lb-product/day} \\ &\quad \times 365 \text{ day/year} \\ &= 85,147 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control potential to emit is less than the PM<sub>10</sub> major source threshold, CAM is not required for the infeed PM<sub>10</sub> emissions unit.

Smog Hog Model SH-20-PE:

The Smog Hog electrostatic precipitator controls PM<sub>10</sub> emissions from the reclaim extruder exhaust. Permit unit C-36-22 does not have an emission limit for the PM<sub>10</sub> emitted from the reclaim extruder exhaust. Therefore, CAM is not required for this emission unit.

- f) C-36-18: SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A DUST COLLECTION SYSTEM, CONSISTING OF A 5,500 CFM TORIT MODEL 4DF16 DUST COLLECTOR IN PARALLEL WITH A 5,500 CFM DONALDSON TORIT MODEL DFO 4-16 DUST COLLECTOR, AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

Unit C-36-18 has a PM<sub>10</sub> emission limit of 4.5 /b/day and add-on controls in the form of two 5,500 cfm dust collectors. The pre-control potential to emit is calculated below.

Two Donaldson Torit dust collectors are configured in parallel, each with an airflow rating of 5,500 cfm.

PM<sub>10</sub> Concentration = 0.002 gr/dscf (From Project N-1151230)  
 Air Flow Rate = 5,500 cfm  
 Control Efficiency = 99%  
 1 pound = 7,000 grains

$$\begin{aligned} PE_{\text{Controlled}} &= \text{Air Flow Rate} \times \text{PM}_{10} \text{ Concentration} \times \text{Operating Time} \\ &= (5,500 \text{ cfm} + 5,500 \text{ cfm}) \times (0.002 \text{ gr/dscf}) \times (\text{lb}/7,000 \text{ gr}) \\ &\quad \times (1,440 \text{ min/day}) \times (365 \text{ day/year}) \\ &= 1,652 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

$$\begin{aligned} PE_{\text{Controlled}} &= PE_{\text{Pre-controlled}} \times (1 - \text{Control Efficiency}) \\ PE_{\text{Pre-controlled}} &= PE_{\text{Controlled}} / (1 - \text{Control Efficiency}) \\ PE_{\text{Pre-controlled}} &= 1,652 \text{ lb-PM}_{10}/\text{year} / (1-0.99) = 165,200 \text{ lb/year} \end{aligned}$$

Since the PM<sub>10</sub> pre-control potential to emit is greater than the PM<sub>10</sub> major source threshold, CAM is required for the Donaldson Torit dust collectors on this permit unit. However, since the permit unit's PM<sub>10</sub> potential to emit after controls is not greater than the PM<sub>10</sub> major source threshold, monitoring data is only required to be collected once every day.

The facility will need to monitor the differential pressure across the dust collectors in order to satisfy the requirements off CAM. The following conditions regarding differential pressure are already listed on permit unit C-36-18-10:

Permit	Conditions	Applicability
C-36-18-10	9, 10, 11	Federal Regulation 40 CFR Part 64

The following conditions will be added to permit unit C-36-18-10 to satisfy the requirements of CAM:



12. *Differential operating pressure shall be monitored and recorded on each day that fluff is received at the fluff silos. [40 CFR Part 64] Federally Enforceable Through Title V permit*

13. *During each day fluff is received at the fluff silos, the permittee shall record the pressure drop of the baghouse and compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V permit*

14. *The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V permit*

15. *The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V permit*

16. *If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V permit*

- g) C-36-17: SIX 17,960 CU. FT. (134,000 GALLON) POLYSTYRENE STORAGE SILOS RECEIVING PELLETS FROM RECLAIM EXTRUDERS AND BULK DELIVERY TRUCKS

Unit C-36-17 emits only particulate matter but is not subject to CAM for PM<sub>10</sub> since the permit does not contain a PM<sub>10</sub> emission limit. Therefore, CAM is not triggered by this unit.

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

Unit C-36-23 emits only VOC emissions but is not subject to CAM for VOC since the unit is not equipped with a control device for VOC. Therefore, CAM is not triggered by this unit.

- i) C-36-24: 12,000 GALLON TOTALLY ENCLOSED METHYL FORMATE STORAGE TANK WITH VAPOR RETURN LINES WHEN UNLOADING TANKS OR VEHICLES

Unit C-36-24 is not subject to CAM since the permit does not contain an emission limit for any criteria pollutant.

**F. 40 CFR Part 68 – Chemical Accident Prevention Provisions**

The purpose of 40 CFR Part 68 is to provide owners and operators of stationary sources with the resources to prevent the accidental release of regulated substances.

40 CFR Part 68 has been amended since the last Title V permit renewal was issued for this facility. However, compliance with the requirements of this rule will be ensured with the permit conditions on the facility-wide permit listed below:

Permit	Condition	Applicability
C-36-0-4	44	Federal Regulation 40 CFR Part 68

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

Per §82.30(a) 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 (as that term is defined in 40 CFR 82.152).

Per §82.30(b) 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.

40 CFR Part 82, Subpart B has been amended since the last Title V permit renewal was issued for this facility. However, compliance with the requirements of this rule will be ensured with the permit conditions on the facility-wide permit listed below:

Permit	Condition	Applicability
C-36-0-4	28	Federal Regulation 40 CFR Part 82, Subpart B

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

Per §82.150(a) 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.

Per §82.150(b) 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.

40 CFR Part 82, Subpart B has been amended since the last Title V permit renewal was issued for this facility. However, compliance with the requirements of this rule will be ensured with the permit conditions on the facility-wide permit listed below:

Permit	Condition	Applicability
C-36-0-4	27	Federal Regulation 40 CFR Part 82, Subpart F

## IX. PERMIT SHIELD

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

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

By submitting Model General Permit Template SJV-UM-0-3 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shields as granted in Model General Permit Template is included as conditions 39 and 40 of the facility-wide requirements (C-36-0-4).

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

The applicant has not proposed any new permit shields for non-model template requirements. However, the following permit shield, currently

included on existing permit C-36-0-3, will be carried over onto renewed Title V permit C-36-0-4 since the requirements of these rules have not changed since the previous renewal:

Permit	Conditions	Applicability
C-36-0-4	41	District Rules 1070, 1081, 2301, 2520, 4102, 4201, 4202, 4623, 4662, and 4682

**C. Obsolete Permit Shields From Existing Permit Requirements**

There were no obsolete permit shields listed in the existing permit requirements.

**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 most recent renewal of the Title V permit are incorporated as permit requirements.

Per the California Environmental Quality Act (CEQA) Statute §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. There will be no physical or operational change to the source or facility nor will the Title V permit renewal authorize a physical or operational change to the source or facility. Therefore, this project, a Title V permit renewal, is subject to a ministerial action that is exempt from CEQA.

**XI. PERMIT CONDITIONS**

See Attachment A - Final Renewed Title V Operating Permits.

**ATTACHMENTS**

- A. Final Renewed Title V Operating Permits
- B. Previous Title V Operating Permits
- C. Detailed Summary List of Facility Permits
- D. Facility Comments and District Responses

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# ATTACHMENT A

Final Renewed Title V Operating Permits

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# San Joaquin Valley Air Pollution Control District

**FACILITY:** C-36-0-4

**EXPIRATION DATE:** 04/30/2027

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1]
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;]
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
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

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.

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) and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, and San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: SJVUAPCD RuleS 1070 (12/17/92), 1081 (12/16/ 93), 2301 (12/17/92), 2520 (6/21/01), 4102 (12/17/ 92), 4201 (12/17/ 92), 4202 (12/17/ 92), 4623 (5/19/05), 4662 (9/20/07), and 4682 (12/15/11). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. All tanks, reservoirs or other containers which are pressure vessels having a capacity greater than 200 gallons, used to store or hold VOC containing blowing agents or organic liquids, shall maintain a working pressure sufficient at all times to prevent organic liquid loss or release of VOC emissions to the atmosphere under normal working conditions. [District Rules 4623 and 4682] Federally Enforceable Through Title V Permit
44. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
45. The operator shall ensure compliance with all applicable requirements of District Rule 4662, Organic Solvent Degreasing Operations, including but not limited to, general operating and control equipment requirements for cold cleaners, open-top vapor degreaser and conveyORIZED solvent degreasers. [District Rule 4662] Federally Enforceable Through Title V Permit
46. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin October 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-1-4

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

VIRGIN RESIN UNLOADING AND STORAGE OPERATION CONSISTING OF FILTER/RECEIVER WITH VACUUM PUMP FILTER AND VACUUM PUMP #VB-01

## PERMIT UNIT REQUIREMENTS

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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-2-14

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 3,000 lb/day or 547,500 lb/year. [District Rule 4102]
15. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
18. Emissions from the combustion of natural gas in the RTO burner shall not exceed any of the following limits: 0.10 lb-NO<sub>x</sub>/MMBtu; 0.084 lb-CO/MMBtu; 0.0076 lb-PM<sub>10</sub>/MMBtu; or 0.00285 lb-SO<sub>x</sub>/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The permittee shall maintain the thermal oxidizer in accordance with the manufacturer's instructions. A copy of the manufacturer's instructions shall be kept onsite and made available for inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The combustion zone of the thermal oxidizer shall be maintained at a minimum of 1,500 degrees Fahrenheit. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
21. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device, during operation the temperature shall be recorded at least every fifteen minutes. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
22. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
23. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
24. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
25. The permittee shall maintain the following minimum air flow rates (scfm) from the respective production areas to the thermal oxidizer when in production: 3500 from the roll storage warehouse; 528 from each foam extrusion die hood; and 203 from each reclaim line smog hog. [District Rule 2201] Federally Enforceable Through Title V Permit
26. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
27. Source testing to measure the minimum destruction efficiency of the thermal oxidizer and the minimum air flow rates from each production area shall be conducted at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 2201 and 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

29. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
30. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
31. The following test methods shall be used: air flow rates - EPA Method 1 or 2; stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC - EPA Method 25 or 25A or ARB Method 100, referenced as methane; exempt VOC compounds - EPA Method 18, or alternative equivalent District and EPA approved test methods. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
32. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
33. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be calculated using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: 
$$\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rule 2201] Federally Enforceable Through Title V Permit
34. 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
35. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
36. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
37. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
38. The permittee shall maintain accurate daily records of the thermal oxidizer combustion temperature. [District Rule 2201] Federally Enforceable Through Title V Permit
39. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-3-13

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-4-12

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-5-8

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-6-8

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-7-9

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-8-7

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-9-7

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-10-9

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-11-9

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-12-9

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-13-8

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-14-10

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-17-7

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

SIX 17,960 CU. FT. (134,000 GALLON) POLYSTYRENE STORAGE SILOS RECEIVING PELLETS FROM RECLAIM EXTRUDERS AND BULK DELIVERY TRUCKS

## PERMIT UNIT REQUIREMENTS

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-18-10

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A DUST COLLECTION SYSTEM, CONSISTING OF A 5,500 CFM TORIT MODEL 4DF16 DUST COLLECTOR IN PARALLEL WITH A 5,500 CFM DONALDSON TORIT MODEL DFO 4-16 DUST COLLECTOR, AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from dust collectors serving fluff silos shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Permittee shall maintain the fluff storage silos at a negative pressure or in a sealed position. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Each fluff silo shall be vented to the dust collection system and then to the thermal oxidizer listed on permit C-36-2. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The dust collectors shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The dust collectors' cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Material removed from the dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Replacement filters numbering at least 10% of the total number of filters in the dust collectors shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The dust collection units shall be equipped with a method to determine the pressure differential across the filters. The equipment used shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. When the Torit Model 4DF16 dust collector is in operation, it shall operate with a minimum differential pressure of 0.1 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
11. When the Donaldson Torit Model DFO 4-16 dust collector is in operation, it shall operate with a minimum differential pressure of 0.1 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
12. The differential operating pressure of both dust collectors shall be monitored and record on each day fluff is received at the fluff silos. [40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



13. During each day fluff is received at the fluff silos, the permittee shall record the pressure drop of the dust collector and compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
14. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
15. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
16. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
17. Combined PM10 emissions from the dust collection system shall not exceed 4.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The VOC capture efficiency of the fluff silos shall be maintained at a minimum of 90%. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
20. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
23. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081, 7.1 and 2201] Federally Enforceable Through Title V Permit
25. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:  $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$ , where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
27. 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. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; where the process throughput, P, is less than or equal to 30 ton/hr, or  $E = 17.31 \times P^{0.16}$ ; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
29. The fluff silos shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
31. Dust collector system filters shall be inspected at least annually, when the unit is not in operation, for tears, scuffs, abrasions or holes which may interfere with the particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Records of dust collector and associated ductwork maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
33. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
34. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
35. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Records of all maintenance of the dust collectors, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
37. The dust collectors' differential operating pressure shall be monitored and recorded on each day that the dust collectors operate. [District Rule 2201] Federally Enforceable Through Title V Permit
38. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-19-10

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-20-12

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-21-9

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-22-8

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-23-6

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-24-2

**EXPIRATION DATE:** 04/30/2027

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

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

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# ATTACHMENT B

Previous Title V Operating Permits

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# San Joaquin Valley Air Pollution Control District

**FACILITY:** C-36-0-3

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

## FACILITY-WIDE REQUIREMENTS

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

Location: 5370 E HOME AVE, FRESNO, CA 93727

C-36-0-3 : Dec 19 2022 2:00PM -- BISHERC

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. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 1070 (12/17/ 92), District Rule 1081 (12/16/ 93), District Rule 2301 (12/17/ 92), District Rule 2520 (6/21/01), District Rule 4102 (12/17/ 92), District Rule 4201 (12/17/ 92), District Rule 4202 (12/17/ 92), District Rule 4623 (5/19/05), District Rule 4662 (9/20/07), and District Rule 4682 (9/20/07). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. All tanks, reservoirs or other containers which are pressure vessels having a capacity greater than 200 gallons, used to store or hold VOC containing blowing agents or organic liquids, shall maintain a working pressure sufficient at all times to prevent organic liquid loss or release of VOC emissions to the atmosphere under normal working conditions. [District Rules 4623 and 4682] Federally Enforceable Through Title V Permit
44. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
45. The operator shall ensure compliance with all applicable requirements of District Rule 4662, Organic Solvent Degreasing Operations, including but not limited to, general operating and control equipment requirements for cold cleaners, open-top vapor degreaser and conveyORIZED solvent degreasers. [District Rule 4662] Federally Enforceable Through Title V Permit
46. On September 30, 2002, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin October 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-1-3

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-2-12

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 3,000 lb/day or 547,500 lb/year. [District Rule 4102]
15. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
18. Emissions from the combustion of natural gas in the RTO burner shall not exceed any of the following limits: 0.10 lb-NOx/MMBtu; 0.084 lb-CO/MMBtu; 0.0076 lb-PM10/MMBtu; or 0.00285 lb-SOx/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The permittee shall maintain the thermal oxidizer in accordance with the manufacturer's instructions. A copy of the manufacturer's instructions shall be kept onsite and made available for inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The combustion zone of the thermal oxidizer shall be maintained at a minimum of 1,500 degrees Fahrenheit. [District Rule 2201 and 40 CFR 64] Federally Enforceable Through Title V Permit
21. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device, during operation the temperature shall be recorded at least every fifteen minutes. [District Rule 2201 and 40 CFR 64] Federally Enforceable Through Title V Permit
22. The permittee shall maintain the following minimum air flow rates (scfm) from the respective production areas to the thermal oxidizer when in production: 3500 from the roll storage warehouse; 528 from each foam extrusion die hood; and 203 from each reclaim line smog hog. [District Rule 2201] Federally Enforceable Through Title V Permit
23. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
24. Source testing to measure the minimum destruction efficiency of the thermal oxidizer and the minimum air flow rates from each production area shall be conducted at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 2201 and 1081] Federally Enforceable Through Title V Permit
26. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

27. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
28. The following test methods shall be used: air flow rates - EPA Method 1 or 2; stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC - EPA Method 25 or 25A or ARB Method 100, referenced as methane; exempt VOC compounds - EPA Method 18, or alternative equivalent District and EPA approved test methods. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
29. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
30. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be calculated using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: 
$$\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rule 2201] Federally Enforceable Through Title V Permit
31. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
32. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
34. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
35. The permittee shall maintain accurate daily records of the thermal oxidizer combustion temperature. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-3-12

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-4-11

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-5-7

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-6-7

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-7-8

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-8-6

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-9-6

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-10-8

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

---

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-11-8

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-12-8

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-13-7

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-14-8

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-17-6

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

**EQUIPMENT DESCRIPTION:**

SIX 17,960 CU. FT. (134,000 GALLON) POLYSTYRENE STORAGE SILOS RECEIVING PELLETS FROM RECLAIM EXTRUDERS AND BULK DELIVERY TRUCKS

## PERMIT UNIT REQUIREMENTS

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-18-9

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

**EQUIPMENT DESCRIPTION:**

SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A DUST COLLECTION SYSTEM, CONSISTING OF A 5,500 CFM TORIT MODEL 4DF16 DUST COLLECTOR IN PARALLEL WITH A 5,500 CFM DONALDSON TORIT MODEL DFO 4-16 DUST COLLECTOR, AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from dust collectors serving fluff silos shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Permittee shall maintain the fluff storage silos at a negative pressure or in a sealed position. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Each fluff silo shall be vented to the dust collection system and then to the thermal oxidizer listed on permit C-36-2. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The dust collectors shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The dust collectors' cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Material removed from the dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Replacement filters numbering at least 10% of the total number of filters in the dust collectors shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The dust collection units shall be equipped with a method to determine the pressure differential across the filters. The equipment used shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
10. When the Torit Model 4DF16 dust collector is in operation, it shall operate with a minimum differential pressure of 0.1 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
11. When the Donaldson Torit Model DFO 4-16 dust collector is in operation, it shall operate with a minimum differential pressure of 0.1 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Combined PM10 emissions from the dust collection system shall not exceed 4.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The VOC capture efficiency of the fluff silos shall be maintained at a minimum of 90%. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
15. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
18. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081, 7.1 and 2201] Federally Enforceable Through Title V Permit
20. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
21. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:  $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$ , where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
22. 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
23. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; where the process throughput, P, is less than or equal to 30 ton/hr, or  $E = 17.31 \times P^{0.16}$ ; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
24. The fluff silos shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. Dust collector system filters shall be inspected at least annually, when the unit is not in operation, for tears, scuffs, abrasions or holes which may interfere with the particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

27. Records of dust collector and associated ductwork maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
28. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
31. Records of all maintenance of the dust collectors, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
32. The dust collectors' differential operating pressure shall be monitored and recorded on each day that the dust collectors operate. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-19-8

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-20-11

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-21-8

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-22-6

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-23-5

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-36-24-1

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

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

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# ATTACHMENT C

Detailed Summary List of Facility Permits

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# Detailed Facility Report

For Facility=36

Sorted by Facility Name and Permit Number

<b>PACTIV, LLC</b> 5370 E HOME AVE FRESNO, CA 93727	<b>FAC #</b> C 36	<b>TYPE:</b> TitleV	<b>EXPIRE ON:</b> 04/30/2021
<b>STATUS:</b> A	<b>AREA:</b> 40004	<b>TOXIC ID:</b> 7 /	<b>INSP. DATE:</b> 05/23
<b>TELEPHONE:</b>			

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-36-1-3	119.0 KGAL UNLOADING	3020-05 E	1	296.00	296.00	A	RAIL CAR UNLOADING, INCLUDING 3 RESIN SILOS, EACH 12 FT DIAM X 47 FT HIGH, PRODUCT SEPARATOR, VACUUM PUMP FILTER AND VACUUM PUMP #VB-01. STORAGE CAPACITY: 15,939 CUFT (119,221 GALLONS)
C-36-2-12	Extrusion Line #1	3020-01 E	1	495.00	495.00	A	POLYSTYRENE FOAM EXTRUSION LINE #1 CONSISTING OF #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD SERVED BY A 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER
C-36-3-12	Extrusion Line #2	3020-01 E	1	495.00	495.00	A	POLYSTYRENE FOAM EXTRUSION LINE #2 CONSISTING OF #EX-20 PRIMARY EXTRUDER, #EX-21 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-11 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2
C-36-4-11	EXTRUSION LINE #3	3020-01 E	1	495.00	495.00	A	POLYSTYRENE FOAM EXTRUSION LINE #3 CONSISTING OF #EX-30 PRIMARY EXTRUDER, #EX-31 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM FEED PUMP #VB-12 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2
C-36-5-7	#G-91 Thermoformer Line	3020-01 A	1	107.00	107.00	A	THERMOFORMER LINE #3 CONSISTING OF A THERMOFORMER, TRIM PRESS, GRINDER AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18
C-36-6-7	#G-92 Thermoformer Line	3020-01 A	1	107.00	107.00	A	THERMOFORMER LINE #4 CONSISTING OF GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE FLUFF SILOS DESCRIBED IN C-36-18
C-36-7-8	#G-93 Thermoformer Line	3020-01 A	1	107.00	107.00	A	THERMOFORMER LINE #5 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18
C-36-8-6	#G-94 Thermoformer Line	3020-01 A	1	107.00	107.00	A	THERMOFORMER LINE #6 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18
C-36-9-6	#G-95 Thermoformer Line	3020-01 A	1	107.00	107.00	A	THERMOFORMER LINE #7 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18
C-36-10-8	#G-96 Thermoformer Line	3020-01 B	1	143.00	143.00	A	THERMOFORMER LINE #8 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18
C-36-11-8	#G-97 Thermoformer Line	3020-01 A	1	107.00	107.00	A	THERMOFORMER LINE #9 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN PERMIT C-36-18

### Detailed Facility Report

For Facility=36

Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-36-12-8	#G-98 Grinder	3020-01 A	1	107.00	107.00	A	THERMOFORMER LINE #10 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18
C-36-13-7	#GR-90, 91 & 92 Grinders	3020-01 E	1	495.00	495.00	A	#GR-90 BULK GRINDER WITH BLOWER, #GR-91 BULK GRINDER WITH BLOWER, AND #GR-92 SHEET GRINDER WITH BLOWER EACH FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18
C-36-14-8	Reclaim Extrusion Line #1	3020-01 E	1	495.00	495.00	A	#EX-40 RECLAIM EXTRUDER #1 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-19) AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17
C-36-15-0	105.0 HP #2RECLAIMEXT	3020-01 D	1	379.00	379.00	D	#2 RECLAIM EXTRUDER
C-36-16-0	80.0 HP #3RECLAIMEXT	3020-01 C	1	239.00	239.00	D	RECLAIM EXTRUDER #3.
C-36-17-6	134 KGAL STORAGE	3020-05 E	1	296.00	296.00	A	SIX 17,960 CU. FT. (134,000 GALLON) POLYSTYRENE STORAGE SILOS RECEIVING PELLETS FROM RECLAIM EXTRUDERS AND BULK DELIVERY TRUCKS
C-36-18-9	152,000 Gallon Fluff Silos	3020-05 E	1	296.00	296.00	A	SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A DUST COLLECTION SYSTEM, CONSISTING OF A 5,500 CFM TORIT MODEL 4DF16 DUST COLLECTOR IN PARALLEL WITH A 5,500 CFM DONALDSON TORIT MODEL DFO 4-16 DUST COLLECTOR, AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2
C-36-19-8	Reclaim Extrusion Line #2	3020-01 E	1	495.00	495.00	A	#EX-50 RECLAIM EXTRUDER #2 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-14) AND THEN THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17
C-36-20-11	Roll Storage Area	3020-01 D	1	379.00	379.00	A	POLYSTYRENE FOAM SHEET ROLL STORAGE AREA (183'L X 160"W X 22'H AVERAGE) VENTED TO THE THERMAL OXIDIZER DESCRIBED IN C-36-2
C-36-21-8	Extrusion line #4	3020-01 E	1	495.00	495.00	A	POLYSTYRENE EXTRUSION LINE #4 CONSISTING OF #EX-40 PRIMARY EXTRUDER, #EX-41 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-40 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2
C-36-22-6	Reclaim Extrusion Line #3	3020-01 E	1	495.00	495.00	A	#EX-70 RECLAIM EXTRUDER #3 SERVED BY SMOG HOG MODEL SH20 E.P. AND A THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING SIX RECLAIM SILOS DESCRIBED IN PTO C-36-17
C-36-23-5	Finished Product Storage	3020-06	1	128.00	128.00	A	POLYSTYRENE FOAM PRODUCT STORAGE WAREHOUSE (28,480 SQ FT)
C-36-24-1	12,000 Gallon Storage Tank	3020-05 B	1	113.00	113.00	A	12,000 GALLON TOTALLY ENCLOSED METHYL FORMATE STORAGE TANK WITH VAPOR RETURN LINES WHEN UNLOADING TANKS OR VEHICLES

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# ATTACHMENT D

## Facility Comments and District Responses

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# FACILITY COMMENTS / DISTRICT RESPONSES

*Facility comments regarding the preliminary decision on the Title V permit renewal for Pactiv, LLC (District facility C-36) are provided below followed by the District's responses. A copy of the facility's January 18, 2023 comment email is available at the District office.*

## **Permit Units C-36-14-10, '-19-10, and '-22-8: Reclaim Extrusion Operations**

### **Facility Comment: Equipment Description Change**

Permit units C-36-14, C-36-19, and C-36-22 should be modified to remove the 42-in cyclone from the equipment description to remain consistent with the previous permit versions.

### **District Response:**

During the preliminary decision for this Title V permit renewal, the District added the term "42 inch cyclone" to each of the equipment descriptions for these three permits to clarify the specific equipment that serves the feed hoppers for each of these reclaim extrusion operations. However, per District practice, the intent of a permit renewal is only to review and assure that the permit requirements conform to the latest applicable District, State and Federal standards. Equipment should not be added or removed to the permit units as a part of the District's permit renewal process.

Additionally, the equipment serving the feed hoppers for each of these reclaim extrusion operations is already referenced within the existing and proposed permit conditions. The feed hoppers for permits C-36-14-10 and '-19-10 are served by a 42 inch cyclone with filter (reference permit condition 4) and the feed hopper of permit '-22-8 is served by a MAC model #39AVRC14 baghouse (reference permit condition 4). Since the permits already reference the control equipment serving the feed hoppers for each of these units, it is not necessary to add that equipment to each unit's equipment description.

Therefore, the equipment descriptions for these three permits will be corrected to match the existing equipment descriptions prior to this Title V permit renewal. The revised equipment descriptions for these three permits are as follows:

C-36-14-10: #EX-40 RECLAIM EXTRUDER #1 SERVED BY ~~A 42-IN CYCLONE WITH FILTER (SHARED WITH C-36-19)~~, SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-19) AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17

C-36-19-10: #EX-50 RECLAIM EXTRUDER #2 SERVED BY A ~~42-IN CYCLONE WITH FILTER (SHARED WITH C-36-14)~~ SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-14) AND THEN

THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING  
THE SIX RECLAIM SILOS DESCRIBED IN C-36-17

C-36-22-8: #EX-70 RECLAIM EXTRUDER #3 SERVED BY A ~~42-IN CYCLONE WITH FILTER~~, SMOG HOG MODEL SH20 EP, AND A THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING SIX RECLAIM SILOS DESCRIBED IN PTO C-36-17

**Permit Unit C-36-18-10: Fluff Silos**

**Facility Comment:** *Condition Control Equipment Nomenclature*

The facility requests the word baghouse in permit unit C-36-18-10, condition 13 be changed to dust collector to remain consistent with other conditions and to accurately reflect the equipment installed.

**District Response:**

Condition 13 was added to this permit as a part of this Title V renewal to assure continued compliance with the requirements of the Code of Federal Regulations, Title 40, Part 64. The District reviewed the equipment associated with the fluff silos and determined that the previous permit only referenced the silos being served by a dust collector and not a baghouse. Since a baghouse and a dust collector operate similarly to remove particulate matter from an exhaust stream, condition 13 on permit unit C-36-18-10 will be revised to correct the term baghouse to dust collector. Condition 13 now reads as follows:

- During each day fluff is received at the fluff silos, the permittee shall record the pressure drop of the *dust collector* and compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64]