MAY 01 2013

Mr. Gary Clowdus  
Pregis Innovative Packaging, Inc.  
8201 W Elowin Court  
Visalia, CA 93291

Re: Notice of Preliminary Decision – Title V Permit Renewal  
District Facility # S-334  
Project # S-1122802

Dear Mr. Clowdus:

Enclosed for your review and comment is the District’s analysis of the application to renew the Federally Mandated Operating Permit for Pregis Innovative Packaging, Inc. at 8201 W Elowin Court, Visalia, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

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

Sincerely,

David Warner  
Director of Permit Services

Enclosures

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

Seyed Sadedin  
Executive Director/Air Pollution Control Officer

<table>
<thead>
<tr>
<th>Northern Region</th>
<th>Central Region (Main Office)</th>
<th>Southern Region</th>
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<tbody>
<tr>
<td>4800 Enterprise Way</td>
<td>1990 E. Gettysburg Avenue</td>
<td>34946 Flyover Court</td>
</tr>
<tr>
<td>Modesto, CA 95350-8718</td>
<td>Fresno, CA 93726-0244</td>
<td>Bakersfield, CA 93308-9725</td>
</tr>
<tr>
<td>Tel: (209) 557-6400 FAX: (209) 557-6475</td>
<td>Tel: (559) 230-6000 FAX: (559) 230-6261</td>
<td>Tel: (661) 392-5500 FAX: (661) 392-5585</td>
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www.valleyair.org
NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED RENEWAL OF
THE FEDERALLY MANDATED OPERATING PERMIT

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed renewal of the Federally Mandated Operating Permit to Pregis Innovative Packaging, Inc. at 8201 W Elowin Court, Visalia, California.

The District's analysis of the legal and factual basis for this proposed action, project #S-1122802, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed renewal of the Federally Mandated Operating permit. If requested, the District will hold a public hearing regarding issuance of this renewed permit. For additional information, please contact the District at (559) 230-6000. Written comments on the proposed initial permit must be submitted by June 6, 2014 to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.
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A. DRAFT RENEWED TITLE V OPERATING PERMIT  
B. PREVIOUS TITLE V OPERATING PERMIT  
C. DETAILED FACILITY LIST
Title V Permit Renewal Evaluation

Plastic Foam Packaging Products Manufacturing

Engineer: G. Heinen
Date: April 12, 2013

Facility Number: S-334
Facility Name: Pregis Innovative Packaging, Inc.
Mailing Address: 8201 W Elowin CT
Visalia, CA 93291

Contact Name: Gary Clowdus
Phone: (559)651-0951 x 104

Responsible Official: Don Crites
Title: Director of Regional Operations

Project #: S-1122802
Deemed Complete: 07/23/12

I. PROPOSAL

Pregis Innovative Packaging, Inc. was issued a Title V permit on September 30, 2008. 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 determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

Pregis Innovative Packaging, Inc. is located at 8201 W Elowin Court in Visalia, CA.
III. EQUIPMENT LISTING

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

IV. GENERAL PERMIT TEMPLATE USAGE

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

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

The applicant has requested to utilize template No. SJV-UM-0-1, 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 the model general permit templates and are not subject to further EPA or public review.

- Conditions 1 through 42 of the requirements for permit unit S-399-0-1.
VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated

The following rules have been amended since the initial Title V permit was issued. The most recent date reflects the version which has been approved by the EPA into the SIP.

- District Rule 2201, New and Modified Stationary Source Review Rule (amended September 21, 2206 ⇒ amended December 18, 2008)

B. Rules Removed

- None.

C. Rules Added


D. Rules Not Updated

The following rules have been not been amended since the initial Title V permit was issued. The most recent date reflects the version which has been approved by the EPA into the SIP.

- District Rule 1080, Stack Monitoring (Amended December 17, 1992)
- District Rule 1081, Source Sampling (Amended December 16, 1993)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4623, Storage of Organic Liquids (amended May 19, 2005)
40 CFR Part 64, Compliance Assurance Monitoring (CAM)


E. Rules included in Template SJV-UM-0-3

The following section indicates the rules which are included in Template SJV-UM-0-3 Facility Wide Umbrella and will not be addressed in this report.

- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2020, Exemptions¹ (amended March 21, 2002 ⇒ amended December 20, 2007)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4101, Visible Emissions (amended November 15, 2001 ⇒ amended February 17, 2005)
- District Rule 4102, Nuisance (amended December 17, 1992)
- District Rule 4601, Architectural Coatings (amended December 17, 2009)
- District Rule 8011, General Requirements (adopted August 19, 2004)

¹ The amendments made to this rule on August 18, 2011 have no impact to this source; therefore template SJV-UM-0-3 is still valid for this project.
• District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities (adopted August 19, 2004)
• District Rule 8031, Bulk Materials (adopted August 19, 2004)
• District Rule 8041, Carryout and Trackout (adopted August 19, 2004)
• District Rule 8051, Open Areas (adopted August 19, 2004)
• District Rule 8061, Paved and Unpaved Roads (adopted August 19, 2004)
• District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (adopted September 16, 2004)
• 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos
• 40 CFR Part 82, Subpart F, Stratospheric Ozone

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

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

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

A. Rules Added

No new rules were added which are not federally enforceable.

B. Rules Not Updated

• District Rule 1070, Inspections (amended December 17, 1992)
• District Rule 4102, Nuisance (as amended December 17, 1992)
• Title 17, California Code of Regulations, Section 92000 through 92540

No changes were made to these rules since the initial Title V permit was issued, therefore, they will not be discussed any further.
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.

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

District Rule 2201 has been amended since this facility’s initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.26, defined as an action including at least one of the following items:

1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
4) Addition of any new emissions unit which is subject to District permitting requirements.
5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable at this time.

B. District Rule 2410 – Prevention of Significant Deterioration

The prevention of significant deterioration (PSD) program is a construction permitting program for new major stationary sources and major modifications to existing major stationary sources located in areas classified as attainment or in areas that are unclassifiable for any criteria air pollutant. The provisions of this rule apply to any source and the owner or operator of any source subject to any requirement under Title 40 Code of Federal Regulations (40 CFR) Part 52.21 as incorporated into this rule.

The rule did not create new requirements, but merely transfers the authority for the 40 CFR Part 52.21 requirements to the District. Prior to adoption of
this rule, that authority was vested with the USEPA. This action does not involve construction and thus does not trigger additional PSD requirements for this source. Therefore, the facility is not subject to this rule and no further discussion is required.

D. District Rule 4682 - Polystyrene, Polyethylene, and Polypropylene Products Manufacturing

The facility currently processes low density polyethylene, linear thermoplastic polymers of ethylene with densities less than 0.94 gram per cubic centimeter, and is therefore is not subject to the rule.

The facility will be required to notify the District and keep records of total product emissions (lb of VOC per 100 pounds of total material processed) and calendar days when processing high density polyethylene and polypropylene.

E. 40 CFR Part 64-CAM

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

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

<table>
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<td>140,000</td>
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<tr>
<td>SOx</td>
<td>140,000</td>
</tr>
</tbody>
</table>

Using these three criteria, the existing permit units were analyzed to determine the applicability of the 40 CFR Part 64 requirements for CAM.
a. Permit Unit S-334-1 – Butane storage tank

This unit only generates VOC emissions, but has neither an emission limits nor add-on controls. Therefore, the CAM requirements of 40 CFR 64 are not applicable and no further discussion is required.

b. Permit Units S-334-2 and ‘-10 - Resin Transfer and Storage Operations

These units only generate PM$_{10}$ emissions. Based on information in the facility files, this facility is only a major source for VOC emissions. Therefore, the CAM requirements of 40 CFR 64 are not applicable for PM$_{10}$ emissions and no further discussion is required.

c. Permit Units S-334-3, ‘-6, ‘-7, ‘-8, ‘-11, ‘-13 and ‘-15 - Foamed Plastic Processing Operations

Section 64.2(b)(vi) states that the requirements of this subpart shall not be applicable for emission limitations or standards for which a part 70 or 71 (Title V) permit specifies a continuous compliance determination method. A continuous compliance determination method is defined as a method, specified by the applicable standard or applicable permit conditions which:

- Is used to determine compliance with an emission limitation or standard on a continuous basis, consistent with the averaging period established for the emission limitation or standard; and
- Provides data either in units of the standard or correlated directly with the compliance limit.

These units are served by a common regenerative thermal oxidizer (RTO). The shared RTO is equipped with a continuous emission monitor system (CEMs) that takes VOC emission readings at least once every 15 minutes. The readings are taken as a concentration, in ppm, and converted to a mass emission rate, in lb/hr. The results of the CEMs are required by permit condition to be averaged at least once per hour. Therefore, these units meet the requirements for a continuous compliance determination method as defined above. Since the CEMs system meets the definition of a continuous compliance determination method, the CAM requirements of 40 CFR 64 are not applicable and no further discussion is required.

d. Permit Units S-334-14 and ‘-17 – Edgefoam Operations

These units only generate PM$_{10}$ emissions. Based on information in the facility files, this facility is only a major source for VOC emissions.
Therefore, the CAM requirements of 40 CFR 64 are not applicable for PM_{10} emissions and no further discussion is required.

e. Permit Units S-334-16 and ‘-19 - Autosawing Operations

These units does not contain emission limits for any pollutant. Since these permits do not contain emission limits for any pollutant, they are not subject to the CAM requirements of 40 CFR Subpart 64 and no further discussion is required.

f. Permit Unit S-334-18 - Polyethylene Foam Goods Warehouse

This unit contains a fugitive VOC emission limit. However, the warehouse is not equipped with external control devices for VOC emissions. Therefore, the CAM requirements of 40 CFR 64 are not applicable and no further discussion is required.

As shown above, none of the units operated by Pregis Innovative Packaging are subject to CAM requirements. Therefore, CAM will not be required as a part of this initial Title V project and no further discussion is necessary.

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

1. Model General Permit Template SJV-UM-0-3

By submitting Model General Permit Template SJV-UM-0-3 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shields as granted in Model General Permit Template is included as conditions 42 and 43 of the facility-wide requirements (334-0-1).

B. Requirements not Addressed by Model General Permit Templates

The applicant is not requesting a new permit shield for any other rule requirements, so no other changes are proposed.
X. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit.

XI. ATTACHMENTS

A. Draft Renewed Title V Operating Permit
B. Previous Title V Operating Permit
C. Detailed Facility List
ATTACHMENT A

Draft Renewed Title V Operating Permit
San Joaquin Valley  
Air Pollution Control District

FACILITY: S-334-0-2  
EXPIRATION DATE: 01/31/2013

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1 and Tulare County Rule 111] Federally Enforceable Through Title V Permit

2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0 and Tulare County Rule 111] Federally Enforceable Through Title V Permit

3. {4364} 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. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit

5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit

6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit

7. {4368} 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. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520 9.4.2 and 4582, 6.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: PREGIS INNOVATIVE PACKAGING INC  
Location: 8201 W ELOWIN COURT, VISALIA, CA 93291-9262

5-334-6-2 / Apr 29 2013 1:29PM - MERINO

DRAFT
10. (4371) The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit

11. (4372) Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit

12. (4373) If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit

13. (4374) It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit

14. (4375) The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit

15. (4376) The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit

16. (4377) The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit

17. (4378) The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit

18. (4379) Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit

19. (4380) Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit

20. (4381) Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit

21. (4382) Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. (4383) No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

23. (4384) 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. (4385) 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. (4386) 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. (4387) With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit

27. (4388) If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit

28. (4389) If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit

29. (4390) Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit

30. (4391) Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit

31. (4392) An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit

32. (4393) Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit

33. (4394) Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. (4395) Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit

35. (4396) Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

36. (4397) The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit

37. (4398) The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit

38. (4399) When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit

39. On September 30, 2008, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

40. (98) No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

41. (4400) Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

42. (4401) Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1:00, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

43. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR 68] Federally Enforceable Through Title V Permit

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

1. Equipment shall be maintained and operated vapor tight (no detectable VOC emissions) so that there is no leakage of n-butane or isobutane to the atmosphere prior to use in extruders. [District NSR Rule and District Rules 4623, 4.1.1 and 4682, 5.2.1] Federally Enforceable Through Title V Permit
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-334-2-7
EXPIRATION DATE: 01/31/2013

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

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

2. All resins beads shall be transferred via closed piping network operating under negative pressure. [District NSR Rule] Federally Enforceable Through Title V Permit

3. The inlet of each vacuum pump shall be served by an inline filter. [District NSR Rule] Federally Enforceable Through Title V Permit

4. Resin throughput to the storage silos shall not exceed 540,000 lb/day or 73,013,856 lb/yr. [District NSR Rule] Federally Enforceable Through Title V Permit

5. Resin throughput to the pellet receivers at extruder inlets shall not exceed 199,104 lb/day or 72,672,960 lb/yr. [District NSR Rule] Federally Enforceable Through Title V Permit

6. Particulate matter (PM-10) emissions shall not exceed 0.008 lb PM10/1,000 lb resin. [District NSR Rule] Federally Enforceable Through Title V Permit

7. Permittee shall maintain accurate daily and annual records of process throughput from silos, day bins, dryers, and pellet receivers at extruder inlets. Records shall be kept for a period of five years and made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit

8. The inline filter(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

9. The inline filter(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

10. Material removed from the inline filter(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

11. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

12. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Inline filter(s) shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.
13. Records of inline filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
PERMIT UNIT: S-334-3-13  
EXPIRATION DATE: 01/31/2013

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

PERMIT UNIT REQUIREMENTS

1. Foam extruder die and initial sheet forming and curing section(s) shall be contained within a permanent total enclosure (PTE) achieving 100% capture efficiency which satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). For the purposes of Method 204, the die exit is considered to be the VOC emitting source. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

2. PTE shall operate in a manner to maintain 100% capture efficiency and shall only vent to thermal oxidizer. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

3. Isobutane, n-butane, a combination of these blowing agents, or other District-approved blowing agents, high density polyethylene (HDPE) resin, low density polyethylene (LDPE) resin, polypropylene (PP) resin, and additives shall be the only materials utilized. [District NSR Rule] Federally Enforceable Through Title V Permit

4. Thermal oxidizer destruction efficiency shall be maintained at no less than 97.5% of VOCs collected on a 3-hour average basis, or the outlet concentration shall be no more than 25 ppm as methane on a 3-hour average basis. [District NSR Rule] Federally Enforceable Through Title V Permit

5. During normal operation, oxidizer combustion chamber temperature shall be maintained at or above 1500 degrees Fahrenheit or at the temperature required to achieve 97.5% destruction as demonstrated during source testing, as indicated by a permanent, operational temperature indicator. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

6. Permittee shall operate thermal oxidizer with a destruction efficiency of no less than 95% of VOC's collected, by weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

7. When linear thermoplastic polymers of ethylene with densities from 0.94 gram per cubic centimeter or higher or polypropylene are manufactured at the facility, total product emissions shall not exceed 2.4 lb VOC/100 lb total material processed. Total product emissions include process fugitive emissions from permit units S-334-3, '-6, '-7, '-8, '-11, '-13 and '-15, RTO exhaust emissions, warehouse emissions, and emissions transported offshore as blowing agent retained in the final product. Material processed consists of resin and blowing agent. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

8. Average daily facility wide blowing agent use for all foamed plastic extrusion operations shall not exceed 12,240 lb/day calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit

9. Emissions from thermal oxidizer stack on a 3-hour average basis, during normal operation, shall not exceed any of the following: NOx - 1 ppmv @ 19% O2; SOx - 0.0066 lb/MMBtu; PM10 - 0.0075 lb/MMBtu; CO - 5 ppmv @ 19% O2; or VOC 15.25 lbs/hr. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.
10. Emissions from thermal oxidizer stack during startup shall not exceed any of the following (averaged over the entire startup period): NOx - 25 ppmv @ 19% O2; SOx - 0.0006 lb/MMBtu; PM10 - 0.0075 lb/MMBtu; CO - 20 ppmv @ 19% O2; or VOC 15.25 lbs/hr. [District NSR Rule] Federally Enforceable Through Title V Permit

11. Startup shall be defined as the period of time during which the thermal oxidizer is brought from a shutdown status until the combustion chamber temperature and the temperature of each bed has reached 1,500 °F. [District NSR Rule] Federally Enforceable Through Title V Permit

12. The duration of start-up time shall not exceed 4.0 hours per occurrence. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

13. The emission control system(s) shall be in operation and emissions shall be minimized insofar as technologically feasible during startup. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

14. Average daily fugitive process VOC emissions (uncaptured process fugitives) from permit units S-334-3, '-6, '-7, '-8, '-11, '-13 and '-15 shall not exceed 135.7 lbs/day [District NSR Rule] Federally Enforceable Through Title V Permit

15. VOC emissions from thermal oxidizer and uncaptured process fugitive emissions shall not exceed 146,840 lbs per rolling 12 month period. [District NSR Rule] Federally Enforceable Through Title V Permit

16. Fugitive process VOC emissions from permit units S-334-3, '-6, '-7, '-8, '-11, '-13 and '-15 shall be determined using the following equation: pounds fugitive process VOC emitted = BAI - (BAD + BAR + WFE); where BAI = pounds blowing agent introduced, BAD = pounds of blowing agent sent to the RTO inlet, BAR = pounds of blowing agent retained in final shipped product, and WFE = pounds of fugitive warehouse VOC emissions (refer to PTO S-334-18). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

17. Oxidizer exhaust stack shall be equipped with permanent stack sampling provisions consistent with SJVUAPCD Rule 1081, EPA Reference Method 1 and OSHA requirements. [District Rule 1081] Federally Enforceable Through Title V Permit

18. Source testing to demonstrate compliance with VOC emission limit (lb/hr from oxidizer stack) and VOC control efficiency (%) of RTO shall be conducted on an annual basis. If the VOC concentrations fall below the source testing equipment's detection levels such that compliance with the 97.5% control efficiency requirement cannot be demonstrated, the permittee may elect to demonstrate compliance with the RTO outlet VOC limit of 25 ppmv. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit

19. Source testing to demonstrate compliance with the 100% capture efficiency of each PTE shall be conducted on an annual basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

20. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing whenever there is a significant product change or a change in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

21. Compliance source testing shall be conducted under conditions representative of normal operation. [District Rule 1081] Federally Enforceable Through Title V Permit

22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

23. The following test methods shall be used: stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC (ppmv) - EPA Method 25 or 25A, ARB Method 100 or EPA Method 18, referenced as methane; and PTE capture efficiency - EPA Method 204. [District Rules 1081', 2520, 9.3.2 and 4682, 6.2] Federally Enforceable Through Title V Permit

24. Weight of VOC blowing agent retained in polymeric materials shall be determined using Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis or Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District Rules 2520, 9.3.2 and 4682, 6.2.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
25. Source testing shall be conducted by an independent laboratory in accordance with EPA guidelines, and shall be witnessed or authorized by the District. The results of each source test shall be submitted to the District within 60 days. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit

26. Thermal oxidizer shall be equipped with a VOC continuous recording emissions monitor (CEM) system that is calibrated and operated in accordance with the requirements of 40 CFR 60, Appendix B, Performance Specification 8. CEM ppm and lb/hr readings shall be calculated as a three-hour and a 1-hour average. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit

27. VOC continuous recording emissions system shall be in operation whenever thermal oxidizer is being used, and shall include the use of a flame ionization detection (FID) analyzer. CEMS shall measure both the inlet and outlet VOC concentrations of the thermal oxidizer and its destruction efficiency shall be continuously monitored and recorded. [District NSR Rule and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

28. Each 1-hour period in a 3-hour average shall commence on the hour. The 3-hour destruction efficiency average will be compiled from the three most recent 1-hour periods. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit

29. Quarterly and annual audits of the VOC CEM system shall be conducted in accordance with 40 CFR 60, Appendix F, Procedure 1, and shall be witnessed or authorized by the District. Audit reports shall be submitted to the District within 60 days of such an audit. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit

30. In the event of a breakdown of the monitoring equipment, the owner shall notify the APCO as soon as possible, but no later than 8 hours after its detection, and shall initiate repairs. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit

31. The owner shall inform the APCO of the intent to shut down any monitoring equipment at least 24 hours prior to the event. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit

32. The permittee shall maintain records of the following: average fugitive process VOC emissions (lb/day using calculations specified above), type of blowing agent used, amount of blowing agent introduced (BAI), and type and quantity of each product shipped. Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rules 1070, 2520, 9.4.2 and 4682, 6.1.1] Federally Enforceable Through Title V Permit

33. The permittee shall maintain a list of all the products manufactured at this facility and each product's associated blowing agent retention rate(s). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

34. The permittee shall maintain records of the date and duration of oxidizer startups and shutdowns. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit

35. The permittee shall maintain accurate daily records of the VOC emissions (lb/day from oxidizer stack) and of the key thermal oxidizer operating parameters, including but not limited to the following: stack flow rate (SCFM), oxidizer bed temperature, and VOC destruction efficiency. These records shall be maintained and provided as required by District Rule 1080 and upon request. [District NSR Rule and District Rules 1070, 1080, 2520, 9.4.2 and 4682, 6.1.2] Federally Enforceable Through Title V Permit

36. District shall be notified of the date that polypropylene is introduced as a new raw material in the plant and records kept of calendar days facility processes linear thermoplastic polymers of ethylene with densities from 0.94 gram per cubic centimeter or higher or polypropylene. [District Rules 1070 and 4682] Federally Enforceable Through Title V Permit

37. When linear thermoplastic polymers of ethylene with densities from 0.94 gram per cubic centimeter or higher or polypropylene are manufactured at the facility, monthly records of total product emissions shall be maintained. [District Rules 1070 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
38. Quarterly continuous emission monitoring system reports shall be submitted to SJVUAPCD, as specified in 40 CFR 60, Appendix F, Procedure 1. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit

39. VOC emissions data reduction, record keeping and quarterly reporting shall be performed as described in sections 7-11 of Rule 1080. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit

40. A violation of emission standards, as shown by the stack-monitoring system, shall be reported to the Air Pollution Control Officer within 96 hours. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit
PERMIT UNIT REQUIREMENTS

1. Only foamed plastic containing high density polyethylene (HDPE), low density polyethylene (LDPE), polypropylene (PP), blowing agent, and additives shall be processed by this equipment. [District NSR Rule] Federally Enforceable Through Title V Permit

2. Grinders, granulators, and any reclaim fluff (ground or shredded plastic such as sheet foam, edge trim, bubble, or plank) feed or storage bins shall only vent to shared baghouse listed on S-334-13. [District NSR Rule] Federally Enforceable Through Title V Permit

3. Silos may receive fluff from grinders and/or shredders listed on S-334-6 and/or S-334-7. [District NSR Rule] Federally Enforceable Through Title V Permit

4. Reclam extruder vent shall only vent to regenerative thermal oxidizer listed on S-334-3 [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

5. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

6. Permittee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95% by weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

7. The permittee shall maintain the records of the following: amount of material processed and equipment used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit

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

1. Only foamed plastic containing high density polyethylene (HDPE), low density polyethylene (LDPE), polypropylene (PP), blowing agent, and additives shall be processed by this equipment. [District NSR Rule] Federally Enforceable Through Title V Permit

2. Grinders, granulators, and any reclaim fluff (ground or shredded plastic such as sheet foam, edge trim, bubble, or plank) feed or storage bins shall only vent to shared baghouse listed on S-334-13. [District NSR Rule] Federally Enforceable Through Title V Permit

3. Silos may receive fluff from grinders and/or shredders listed on S-334-6 and/or S-334-7. [District NSR Rule] Federally Enforceable Through Title V Permit

4. Reclaim extruder vent shall only vent to regenerative thermal oxidizer listed on S-334-3 [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

5. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

6. Permittee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95% by weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

7. The permittee shall maintain the records of the following: amount of material processed and equipment used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-334-8-3
EXPIRATION DATE: 01/31/2013

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

PERMIT UNIT REQUIREMENTS

1. Foam extruder die and plank forming section(s) shall be contained within a controlled environment enclosure vented to the regenerative thermal oxidizer listed on S-334-3. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

2. Isobutane, n-butane, a combination of these blowing agents, or other District-approved blowing agents, high density polyethylene (HDPE) resin, low density polyethylene (LDPE) resin, polypropylene (PP) resin, and additives shall be the only materials utilized. [District NSR Rule] Federally Enforceable Through Title V Permit

3. Extruded planks shall only be aged within the controlled environment plank aging room which qualifies as a permanent total enclosure (PTE), achieving 100% capture efficiency and satisfies the requirements of 40 C.F.R. Part 51, Appendix M, Test Method 204 ("Criteria for and Verification of a Permanent of Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

4. PTE shall operate in a manner to maintain 100% capture efficiency and shall only vent to thermal oxidizer listed on S-334-3. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

5. Average daily facility wide blowing agent use for all foamed plastic extrusion operations shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

6. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

7. Permittee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95% by weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

8. Source testing to demonstrate compliance with the 100% capture efficiency of each PTE shall be conducted on an annual basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

9. The following test method shall be used: PTE capture efficiency - EPA Method 204. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

10. The permittee shall maintain the following records of operation: amount of material processed, equipment used, and the type of blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-334-10-5

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

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All resins beads shall be transferred via closed piping network operating under negative pressure. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The inlet of each vacuum pump shall be served by an inline filter. [District NSR Rule] Federally Enforceable Through Title V Permit
4. PM10 emissions shall not exceed 0.036 lb/ton resin bead throughput at each emission point. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emission rate from this transfer operation shall not exceed 5.5 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Permittee shall maintain accurate daily records of process throughput from silos, day bins, dryers, and pellet receivers at extruder inlets. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The inline filter(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. The inline filter(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Material removed from the inline filter(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Inline filter(s) shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Records of inline filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

1. Foam extruder die and initial sheet forming and curing section(s) shall be contained within a permanent total enclosure (PTE) achieving 100% capture efficiency which satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

2. Extruded sheet measuring 1/2 inch thickness or greater shall only be aged within a controlled environment work in process (WIP) aging room (shared with S-334-15) which qualifies as a permanent total enclosure (PTE), achieving 100% capture efficiency and satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

3. PTE's shall operate in a manner to maintain 100% capture efficiency and shall only vent to thermal oxidizer listed on S-334-3. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

4. Isobutane, n-butane, a combination of these blowing agents, or other District-approved blowing agents, high density polyethylene (HDPE) resin, low density polyethylene (LDPE) resin, polypropylene (PP) resin, and additives shall be the only materials utilized. [District NSR Rule] Federally Enforceable Through Title V Permit

5. Average daily facility wide blowing agent use for all foamed plastic extrusion operations shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

6. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

7. Permittee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95%, by weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

8. Source testing to demonstrate compliance with the 100% capture efficiency of each PTE shall be conducted on an annual basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

9. The following test method shall be used: PTE capture efficiency - EPA Method 204. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

10. The permittee shall maintain the following records of operation: amount of material processed, equipment used, and the type of blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit

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

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

2. The baghouses shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

3. Visible emissions from each baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit

4. Baghouses shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the filter bags or cartridges. [District Rule 2201] Federally Enforceable Through Title V Permit

5. Baghouses shall exhaust only to the regenerative thermal oxidizer listed on S-334-3. [District Rule 2201] Federally Enforceable Through Title V Permit

6. Cleaning frequency and duration of each baghouse shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit

7. Material removed from dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

8. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

9. PM10 emission rate from the FARR Model GS-8 baghouse shall not exceed 0.08 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

10. The maximum quantity of material collected by the FARR Model GS-8 baghouse shall not exceed 750 lb/day on a monthly average. [District Rule 2201] Federally Enforceable Through Title V Permit

11. PM10 emission rate from the Farr Corporation cartridge baghouse shall not exceed 0.05 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

12. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District Rule 2201] Federally Enforceable Through Title V Permit

13. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
14. Dust collection system(s) shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Baghouses shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

15. Differential operating pressure shall be monitored and recorded on each day that the baghouses operate. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

16. Monthly records of daily average of the quantity of material collected in the FARR Model GS-8 baghouse shall be maintained. Records of all maintenance of the baghouses, including all change outs of filter media, shall also be maintained, retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

2. Visible emissions from each dust collector system serving sawing systems shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit

3. The Edgefoam Machine line throughput shall not exceed 50,400 linear feet of material per day. [District NSR Rule] Federally Enforceable Through Title V Permit

4. PM10 emission rate shall not exceed 1.6 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit

5. Permittee shall maintain accurate daily records of Edgefoam Machine line throughput for a period of five years, and shall make such records available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit

6. The dust collector(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

7. The dust collector(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

8. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

9. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

10. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-334-15-3

EXPIRATION DATE: 01/31/2013

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

PERMIT UNIT REQUIREMENTS

1. Foam extruder die and initial sheet forming and curing section(s) shall be contained within a permanent total enclosure (PTE) achieving 100% capture efficiency which satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

2. Extruded sheet measuring 1/2 inch thickness or greater shall only be aged within a controlled environment work in process (WIP) aging room (shared with S-334-11) which qualifies as a permanent total enclosure (PTE), achieving 100% capture efficiency and satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

3. PTE's shall operate in a manner to maintain 100% capture efficiency and shall only vent to thermal oxidizer listed on S-334-3. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

4. Isobutane, n-butane, a combination of these blowing agents, or other District-approved blowing agents, high density polyethylene (HDPE) resin, low density polyethylene (LDPE) resin, polypropylene (PP) resin, and additives shall be the only materials utilized. [District NSR Rule] Federally Enforceable Through Title V Permit

5. Average daily facility wide blowing agent use for all foamed plastic extrusion operations shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

6. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

7. Permittee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95%, by weight. [District Rule 5.1.2] Federally Enforceable Through Title V Permit

8. Source testing to demonstrate compliance with the 100% capture efficiency of each PTE shall be conducted on an annual basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

9. The following test method shall be used: PTE capture efficiency - EPA Method 204. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

10. The permittee shall maintain the following records of operation: amount of material processed, equipment used, and the type of blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-334-16-2

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

2. The dust collector(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

3. The dust collector(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

5. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

6. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

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

Facility Name: PREGIS INNOVATIVE PACKAGING INC
Location: 8201 W ELOWIN COURT, VISALIA, CA 93291-9262

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

2. The dust collector(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

3. The dust collector(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

5. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

6. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

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

1. Fugitive warehouse VOC emissions from work in process and finished goods storage shall not exceed 125 tons per year. [District Rule 2080] Federally Enforceable Through Title V Permit

2. Fugitive warehouse VOC emissions from all polyethylene and polypropylene operations shall be determined using the following equation: pounds fugitive warehouse VOC emitted = FPS x (BAX - BAS); where FPS = pounds of finished product shipped, BAX = pounds of blowing agent retained per pound of finished product at the end of the extrusion process (winder), and BAS = pounds of blowing agent retained per pound of finished product upon shipment. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

3. Permittee shall maintain records to document compliance with the fugitive warehouse VOC emission limit. [District Rules 1070 and 2080] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-334-19-2
EXPIRATION DATE: 01/31/2013

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

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit

2. Visible emissions from the exhaust of the dust collector serving the autosaw operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit

3. Dust collector exhaust fan(s) shall be switched on prior to the start-up of autosaw operation. [District Rule 2201] Federally Enforceable Through Title V Permit

4. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

5. All filters shall be properly maintained and must be in place during the autosaw operation(s). [District Rule 2201] Federally Enforceable Through Title V Permit

6. Replacement cartridge filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit

7. PM10 emissions from the dust collector shall not exceed 0.01 gr/dscf. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit

8. Air flow rate to dust collector shall not exceed 1900 scfm. [District Rule 2201] Federally Enforceable Through Title V Permit

9. The dust collector(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit

10. Dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit

11. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

12. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2201] Federally Enforceable Through Title V Permit

13. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.
14. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

15. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit

16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
Permit to Operate

FACILITY: S-334

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

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

FACILITY DESCRIPTION: PLASTIC FOAM PRODUCTS MANUFACTURING

EXPIRATION DATE: 01/31/2013

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

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

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services
FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1 and Tulare County Rule 1111] Federally Enforceable Through Title V Permit

2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0 and Tulare County Rule 1111] 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 (3/21/02). [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 9.12.1] Federally Enforceable Through Title V Permit

6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit

7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit

8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2 and 4682, 6.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: PREGIS INNOVATIVE PACKAGING INC
Location: 8201 W ELOWIN COURT, VISALIA, CA 93291-9262
5-2040-1 Apr 29 2013 11:47AM - JESKO
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 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit

24. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) 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 (10/31/01). [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 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 82, Subpart B. [40 CFR 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit

30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit

31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit

32. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit

33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

34. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit

35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit

37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit

38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit

39. On September 30, 2008, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

40. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

41. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR 68] Federally Enforceable Through Title V Permit

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

1. Equipment shall be maintained and operated vapor tight (no detectable VOC emissions) so that there is no leakage of n-butane or isobutane to the atmosphere prior to use in extruders. [District NSR Rule and District Rules 4623, 4.1.1 and 4682, 5.2.1] Federally Enforceable Through Title V Permit
PERMIT UNIT: S-334-2-5
EXPIRATION DATE: 01/31/2013

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

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

2. All resins beads shall be transferred via closed piping network operating under negative pressure. [District NSR Rule] Federally Enforceable Through Title V Permit

3. The inlet of each vacuum pump shall be served by an inline filter. [District NSR Rule] Federally Enforceable Through Title V Permit

4. Resin throughput to the storage silos shall not exceed 540,000 lb/day or 73,013,856 lb/yr. [District NSR Rule] Federally Enforceable Through Title V Permit

5. Resin throughput to the pellet receivers at extruder inlets shall not exceed 199,104 lb/day or 72,672,960 lb/yr. [District NSR Rule] Federally Enforceable Through Title V Permit

6. Particulate matter (PM-10) emissions shall not exceed 0.008 lb PM10/1,000 lb resin. [District NSR Rule] Federally Enforceable Through Title V Permit

7. Permittee shall maintain accurate daily and annual records of process throughput from silos, day bins, dryers, and pellet receivers at extruder inlets. Records shall be kept for a period of five years and made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit

8. The inline filter(s) shall be maintained and operated according to manufacturer’s specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

9. The inline filter(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

10. Material removed from the inline filter(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

11. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

12. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Inline filter(s) shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.
13. Records of inline filter maintenance, inspections, and repair shall be maintained. The records shall include
identification of the equipment, date of inspection, corrective action taken, and identification of the individual
performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-334-3-12
EXPIRATION DATE: 01/31/2013

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

PERMIT UNIT REQUIREMENTS

1. Foam extruder die and initial sheet forming and curing section(s) shall be contained within a permanent total enclosure (PTE) achieving 100% capture efficiency which satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). For the purposes of Method 204, the die exit is considered to be the VOC emitting source. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

2. PTE shall operate in a manner to maintain 100% capture efficiency and shall only vent to thermal oxidizer. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

3. Isobutane, n-butane, a combination of these blowing agents, or other District-approved blowing agents, high density polyethylene (HDPE) resin, low density polyethylene (LDPE) resin, polypropylene (PP) resin, and additives shall be the only materials utilized. [District NSR Rule] Federally Enforceable Through Title V Permit

4. Thermal oxidizer destruction efficiency shall be maintained at no less than 97.5% of VOCs collected on a 3-hour average basis, or the outlet concentration shall be no more than 25 ppm as methane on a 3-hour average basis. [District NSR Rule] Federally Enforceable Through Title V Permit

5. During normal operation, oxidizer combustion chamber temperature shall be maintained at or above 1500 degrees Fahrenheit or at the temperature required to achieve 97.5% destruction as demonstrated during source testing, as indicated by a permanent, operational temperature indicator. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

6. Permittee shall operate thermal oxidizer with a destruction efficiency of no less than 95% of VOC's collected, by weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

7. When linear thermoplastic polymers of ethylene with densities from 0.94 gram per cubic centimeter or higher or polypropylene are manufactured at the facility, total product emissions shall not exceed 2.4 lb VOC/100 lb total material processed. Total product emissions include process fugitive emissions from permit units S-334-3, '-6, '-7, '-8, '-11, '-13 and '-15, RTO exhaust emissions, warehouse emissions, and emissions transported offsite as blowing agent retained in the final product. Material processed consists of resin and blowing agent. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

8. Average daily facility wide blowing agent use for all foamed plastic extrusion operations shall not exceed 12,240 lb/day calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit

9. Emissions from thermal oxidizer stack on a 3-hour average basis, during normal operation, shall not exceed any of the following: NOx - 1 ppmv @ 19% O2; SOx - 0.0006 lb/MMBtu; PM10 - 0.0075 lb/MMBtu; CO - 5 ppmv @ 19% O2; or VOC 15.25 lbs/hr. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.
10. Emissions from thermal oxidizer stack during startup shall not exceed any of the following (averaged over the entire startup period): NOx - 25 ppmv @ 19% O2; SOx - 0.0006 lb/MMBtu; PM10 - 0.0075 lb/MMBtu; CO - 20 ppmv @ 19% O2; or VOC 15.25 lbs/hr. [District NSR Rule] Federally Enforceable Through Title V Permit

11. Startup shall be defined as the period of time during which the thermal oxidizer is brought from a shutdown status until the combustion chamber temperature and the temperature of each bed has reached 1,500 °F. [District NSR Rule] Federally Enforceable Through Title V Permit

12. The duration of start-up time shall not exceed 4.0 hours per occurrence. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

13. The emission control system(s) shall be in operation and emissions shall be minimized insofar as technologically feasible during startup. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

14. Average daily fugitive process VOC emissions (uncaptured process fugitives) from permit units S-334-3, `6, `7, `8, `11, `13 and `15 shall not exceed 135.7 lbs/day [District NSR Rule] Federally Enforceable Through Title V Permit

15. VOC emissions from thermal oxidizer and uncaptured process fugitive emissions shall not exceed 146,840 lbs per rolling 12 month period. [District NSR Rule] Federally Enforceable Through Title V Permit

16. Fugitive process VOC emissions from permit units S-334-3, `6, `7, `8, `11, `13 and `15 shall be determined using the following equation: pounds fugitive process VOC emitted = BAI - (BAD + BAR + WFE); where BAI = pounds blowing agent introduced, BAD = pounds of blowing agent sent to the RTO inlet, BAR = pounds of blowing agent retained in final shipped product, and WFE = pounds of fugitive warehouse VOC emissions (refer to PTO S-334-18). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

17. Oxidizer exhaust stack shall be equipped with permanent stack sampling provisions consistent with SJVUAPCD Rule 1081, EPA Reference Method 1 and OSHA requirements. [District Rule 1081] Federally Enforceable Through Title V Permit

18. Source testing to demonstrate compliance with VOC emission limit (lb/hr from oxidizer stack) and VOC control efficiency (%) of RTO shall be conducted on an annual basis. If the VOC concentrations fall below the source testing equipment's detection levels such that compliance with the 97.5% control efficiency requirement cannot be demonstrated, the permittee may elect to demonstrate compliance with the RTO outlet VOC limit of 25 ppmv. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit

19. Source testing to demonstrate compliance with the 100% capture efficiency of each PTE shall be conducted on an annual basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

20. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing whenever there is a significant product change or a change in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

21. Compliance source testing shall be conducted under conditions representative of normal operation. [District Rule 1081] Federally Enforceable Through Title V Permit

22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

23. The following test methods shall be used: stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC (ppmv) - EPA Method 25 or 25A, ARB Method 100 or EPA Method 18, referenced as methane; and PTE capture efficiency - EPA Method 204. [District Rules 1081, 2520, 9.3.2 and 4682, 6.2] Federally Enforceable Through Title V Permit

24. Weight of VOC blowing agent retained in polymeric materials shall be determined using Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District Rules 2520, 9.3.2 and 4682, 6.2.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
25. Source testing shall be conducted by an independent laboratory in accordance with EPA guidelines, and shall be
witnessed or authorized by the District. The results of each source test shall be submitted to the District within 60
days. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit

26. Thermal oxidizer shall be equipped with a VOC continuous recording emissions monitor (CEM) system that is
calibrated and operated in accordance with the requirements of 40 CFR 60, Appendix B, Performance Specification 8.
CEM ppm and lb/hr readings shall be calculated as a three-hour and a 1-hour average. [District NSR Rule and District
Rule 1080] Federally Enforceable Through Title V Permit

27. VOC continuous recording emissions system shall be in operation whenever thermal oxidizer is being used, and shall
include the use of a flame ionization detection (FID) analyzer. CEMS shall measure both the inlet and outlet VOC
concentrations of the thermal oxidizer and its destruction efficiency shall be continuously monitored and recorded.
[District NSR Rule and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

28. Each 1-hour period in a 3-hour average shall commence on the hour. The 3-hour destruction efficiency average will be
compiled from the three most recent 1-hour periods. [District NSR Rule and District Rule 1081] Federally Enforceable
Through Title V Permit

29. Quarterly and annual audits of the VOC CEM system shall be conducted in accordance with 40 CFR 60, Appendix F,
Procedure 1, and shall be witnessed or authorized by the District. Audit reports shall be submitted to the District
within 60 days of such an audit. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V
Permit

30. In the event of a breakdown of the monitoring equipment, the owner shall notify the APCO as soon as possible, but no
later than 8 hours after its detection, and shall initiate repairs. [District NSR Rule and District Rule 1080] Federally
Enforceable Through Title V Permit

31. The owner shall inform the APCO of the intent to shut down any monitoring equipment at least 24 hours prior to the
event. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit

32. The permittee shall maintain records of the following: average fugitive process VOC emissions (lb/day using
calculations specified above), type of blowing agent used, amount of blowing agent introduced (BAI), and type and
quantity of each product shipped. Records shall be maintained with minimum monthly totals with the ability to
calculate daily averages based on the number of operating days in any given month. For each month, daily average
records shall be updated by no later than the end of the following month. [District NSR Rule and District Rules 1070,
2520, 9.4.2 and 4682, 6.1.1] Federally Enforceable Through Title V Permit

33. The permittee shall maintain a list of all the products manufactured at this facility and each product’s associated
blowing agent retention rate(s). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

34. The permittee shall maintain records of the date and duration of oxidizer startups and shutdowns. [District NSR Rule
and District Rule 1070] Federally Enforceable Through Title V Permit

35. The permittee shall maintain accurate daily records of the VOC emissions (lb/day from oxidizer stack) and of the key
thermal oxidizer operating parameters, including but not limited to the following: stack flow rate (SCFM), oxidizer bed
temperature, and VOC destruction efficiency. These records shall be maintained and provided as required by District
Rule 1080 and upon request. [District NSR Rule and District Rules 1070, 1080, 2520, 9.4.2 and 4682, 6.1.2] Federally
Enforceable Through Title V Permit

36. District shall be notified of the date that polypropylene is introduced as a new raw material in the plant and records
kept of calendar days facility processes linear thermoplastic polymers of ethylene with densities from 0.94 gram per
cubic centimeter or higher or polypropylene. [District Rules 1070 and 4682] Federally Enforceable Through Title V
Permit

37. When linear thermoplastic polymers of ethylene with densities from 0.94 gram per cubic centimeter or higher or
polypropylene are manufactured at the facility, monthly records of total product emissions shall be maintained.
[District Rules 1070 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.
38. Quarterly continuous emission monitoring system reports shall be submitted to SJVUAPCD, as specified in 40 CFR 60, Appendix F, Procedure 1. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit

39. VOC emissions data reduction, record keeping and quarterly reporting shall be performed as described in sections 7-11 of Rule 1080. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit

40. A violation of emission standards, as shown by the stack-monitoring system, shall be reported to the Air Pollution Control Officer within 96 hours. [District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-334-6-8
EXPIRATION DATE: 01/31/2013

SECTION: 28   TOWNSHIP: 16S   RANGE: 24E

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

PERMIT UNIT REQUIREMENTS

1. Only foamed plastic containing high density polyethylene (HDPE), low density polyethylene (LDPE), polypropylene
   (PP), blowing agent, and additives shall be processed by this equipment. [District NSR Rule] Federally Enforceable
   Through Title V Permit

2. Grinders, granulators, and any reclaim fluff (ground or shredded plastic such as sheet foam, edge trim, bubble, or
   plank) feed or storage bins shall only vent to shared baghouse listed on S-334-13. [District NSR Rule] Federally
   Enforceable Through Title V Permit

3. Silos may receive fluff from grinders and/or shredders listed on S-334-6 and/or S-334-7. [District NSR Rule] Federally
   Enforceable Through Title V Permit

4. Reclaim extruder vent shall only vent to regenerative thermal oxidizer listed on S-334-3 [District NSR Rule and
   District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

5. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally
   Enforceable Through Title V Permit

6. Permitter shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90
   percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95% by
   weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

7. The permittee shall maintain the records of the following: amount of material processed and equipment used. Records
   shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month.
   For each month, daily average records shall be updated by no later than the end of the following month. [District Rule
   4682, 6.1.1] Federally Enforceable Through Title V Permit

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

1. Only foamed plastic containing high density polyethylene (HDPE), low density polyethylene (LDPE), polypropylene (PP), blowing agent, and additives shall be processed by this equipment. [District NSR Rule] Federally Enforceable Through Title V Permit

2. Grinders, granulators, and any reclaim fluff (ground or shredded plastic such as sheet foam, edge trim, bubble, or plank) feed or storage bins shall only vent to shared baghouse listed on S-334-13. [District NSR Rule] Federally Enforceable Through Title V Permit

3. Silos may receive fluff from grinders and/or shredders listed on S-334-6 and/or S-334-7. [District NSR Rule] Federally Enforceable Through Title V Permit

4. Reclaim extruder vent shall only vent to regenerative thermal oxidizer listed on S-334-3 [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

5. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

6. Permittee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95% by weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

7. The permittee shall maintain the records of the following: amount of material processed and equipment used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit

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

1. Foam extruder die and plank forming section(s) shall be contained within a controlled environment enclosure vented to the regenerative thermal oxidizer listed on S-334-3. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

2. Isobutane, n-butane, a combination of these blowing agents, or other District-approved blowing agents, high density polyethylene (HDPE) resin, low density polyethylene (LDPE) resin, polypropylene (PP) resin, and additives shall be the only materials utilized. [District NSR Rule] Federally Enforceable Through Title V Permit

3. Extruded planks shall only be aged within the controlled environment plank aging room which qualifies as a permanent total enclosure (PTE), achieving 100% capture efficiency and satisfies the requirements of 40 C.F.R. Part 51, Appendix M, Test Method 204 ("Criteria for and Verification of a Permanent of Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

4. PTE shall operate in a manner to maintain 100% capture efficiency and shall only vent to thermal oxidizer listed on S-334-3. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

5. Average daily facility wide blowing agent use for all foamed plastic extrusion operations shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

6. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

7. Permittee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95% by weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

8. Source testing to demonstrate compliance with the 100% capture efficiency of each PTE shall be conducted on an annual basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

9. The following test method shall be used: PTE capture efficiency - EPA Method 204. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

10. The permittee shall maintain the following records of operation: amount of material processed, equipment used, and the type of blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit

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

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

2. All resins beads shall be transferred via closed piping network operating under negative pressure. [District NSR Rule] Federally Enforceable Through Title V Permit

3. The inlet of each vacuum pump shall be served by an inline filter. [District NSR Rule] Federally Enforceable Through Title V Permit

4. PM10 emissions shall not exceed 0.036 lb/ton resin bead throughput at each emission point. [District NSR Rule] Federally Enforceable Through Title V Permit

5. PM10 emission rate from this transfer operation shall not exceed 5.5 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit

6. Permittee shall maintain accurate daily records of process throughput from silos, day bins, dryers, and pellet receivers at extruder inlets. [District NSR Rule] Federally Enforceable Through Title V Permit

7. The inline filter(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

8. The inline filter(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

9. Material removed from the inline filter(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

10. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

11. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Inline filter(s) shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-334-11-2
EXPIRATION DATE: 01/31/2013

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

PERMIT UNIT REQUIREMENTS

1. Foam extruder die and initial sheet forming and curing section(s) shall be contained within a permanent total enclosure
   (PTE) achieving 100% capture efficiency which satisfies the requirements of EPA Test Method 204 ("Criteria for and
   Verification of a Permanent or Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2]
   Federally Enforceable Through Title V Permit

2. Extruded sheet measuring 1/2 inch thickness or greater shall only be aged within a controlled environment work in
   process (WIP) aging room (shared with S-334-15) which qualifies as a permanent total enclosure (PTE), achieving
   100% capture efficiency and satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a
   Permanent or Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable
   Through Title V Permit

3. PTE's shall operate in a manner to maintain 100% capture efficiency and shall only vent to thermal oxidizer listed on
   S-334-3. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

4. Isobutane, n-butane, a combination of these blowing agents, or other District-approved blowing agents, high density
   polyethylene (HDPE) resin, low density polyethylene (LDPE) resin, polypropylene (PP) resin, and additives shall be
   the only materials utilized. [District NSR Rule] Federally Enforceable Through Title V Permit

5. Average daily facility wide blowing agent use for all foamed plastic extrusion operations shall not exceed the amounts
   identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

6. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally
   Enforceable Through Title V Permit

7. Permittee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90
   percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95%, by
   weight. [District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

8. Source testing to demonstrate compliance with the 100% capture efficiency of each PTE shall be conducted on an
   annual basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

9. The following test method shall be used: PTE capture efficiency - EPA Method 204. [District Rule 2520, 9.3.2]
   Federally Enforceable Through Title V Permit

10. The permittee shall maintain the following records of operation: amount of material processed, equipment used, and
    the type of blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to
    calculate daily averages in any given month. For each month, daily average records shall be updated by no later than
    the end of the following month. [District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-334-13-6

EXPIRATION DATE: 01/31/2013

EQUIPMENT DESCRIPTION:
R-LAM LAMINATOR AND SAWING OPERATION WITH FARR MODEL GS-8 DUST COLLECTOR VENTED TO RTO LISTED ON S-334-3 AND FARR CORPORATION BAGHOUSE SHARED WITH PERMIT UNITS S-334-6 AND '7 VENTED TO RTO LISTED ON S-334-3

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/scf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

2. The baghouses shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

3. Visible emissions from each baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2021] Federally Enforceable Through Title V Permit

4. Baghouses shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the filter bags or cartridges. [District Rule 2021] Federally Enforceable Through Title V Permit

5. Baghouses shall exhaust only to the regenerative thermal oxidizer listed on S-334-3. [District Rule 2021] Federally Enforceable Through Title V Permit

6. Cleaning frequency and duration of each baghouse shall be adjusted to optimize the control efficiency. [District Rule 2021] Federally Enforceable Through Title V Permit

7. Material removed from dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2021] Federally Enforceable Through Title V Permit

8. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

9. PM10 emission rate from the FARR Model GS-8 baghouse shall not exceed 0.08 lb/day. [District Rule 2021] Federally Enforceable Through Title V Permit

10. The maximum quantity of material collected by the FARR Model GS-8 baghouse shall not exceed 750 lb/day on a monthly average. [District Rule 2021] Federally Enforceable Through Title V Permit

11. PM10 emission rate from the Farr Corporation cartridge baghouse shall not exceed 0.05 lb/day. [District Rule 2021] Federally Enforceable Through Title V Permit

12. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District Rule 2021] Federally Enforceable Through Title V Permit

13. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
14. Dust collection system(s) shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Baghouses shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

15. Differential operating pressure shall be monitored and recorded on each day that the baghouses operate. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

16. Monthly records of daily average of the quantity of material collected in the FARR Model GS-8 baghouse shall be maintained. Records of all maintenance of the baghouses, including all change outs of filter media, shall also be maintained, retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

2. Visible emissions from each dust collector system serving sawing systems shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit

3. The Edgefoam Machine line throughput shall not exceed 50,400 linear feet of material per day. [District NSR Rule] Federally Enforceable Through Title V Permit

4. PM10 emission rate shall not exceed 1.6 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit

5. Permittee shall maintain accurate daily records of Edgefoam Machine line throughput for a period of five years, and shall make such records available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit

6. The dust collector(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

7. The dust collector(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

8. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

9. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

10. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

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

1. Foam extruder die and initial sheet forming and curing section(s) shall be contained within a permanent total enclosure (PTE) achieving 100% capture efficiency which satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

2. Extruded sheet measuring 1/2 inch thickness or greater shall only be aged within a controlled environment work in process (WIP) aging room (shared with S-334-11) which qualifies as a permanent total enclosure (PTE), achieving 100% capture efficiency and satisfies the requirements of EPA Test Method 204 ("Criteria for and Verification of a Permanent or Temporary Total Enclosure"). [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

3. PTE's shall operate in a manner to maintain 100% capture efficiency and shall only vent to thermal oxidizer listed on S-334-3. [District NSR Rule and District Rule 4682, 5.1.2] Federally Enforceable Through Title V Permit

4. Isobutane, n-butane, a combination of these blowing agents, or other District-approved blowing agents, high density polyethylene (HDPE) resin, low density polyethylene (LDPE) resin, polypropylene (PP) resin, and additives shall be the only materials utilized. [District NSR Rule] Federally Enforceable Through Title V Permit

5. Average daily facility wide blowing agent use for all foamed plastic extrusion operations shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

6. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit

7. Permitee shall operate all controllable VOC emission sources with a collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95%, by weight. [District Rule 5.1.2] Federally Enforceable Through Title V Permit

8. Source testing to demonstrate compliance with the 100% capture efficiency of each PTE shall be conducted on an annual basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

9. The following test method shall be used: PTE capture efficiency - EPA Method 204. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

10. The permittee shall maintain the following records of operation: amount of material processed, equipment used, and the type of blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit

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

1. Particulate matter emissions shall not exceed 0.1 grains/scf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

2. The dust collector(s) shall be maintained and operated according to manufacturer’s specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

3. The dust collector(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

5. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

6. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-334-17-1
EXPIRATION DATE: 01/31/2013

EQUIPMENT DESCRIPTION:
EDGEFOAM OPERATION WITH EDGEFOAM MACHINE #1 SERVED BY A 3 HP SOCO MACHINERY MODEL SAC-2041
DUCT COLLECTOR AND 5 HP QUICKDRAFT MODEL MH557 SCRAP REMOVAL VACUUM SYSTEM

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dfsfc in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The dust collector(s) shall be maintained and operated according to manufacturer’s specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. The dust collector(s) cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

1. Fugitive warehouse VOC emissions from work in process and finished goods storage shall not exceed 125 tons per year. [District Rule 2080] Federally Enforceable Through Title V Permit

2. Fugitive warehouse VOC emissions from all polyethylene and polypropylene operations shall be determined using the following equation: pounds fugitive warehouse VOC emitted = FPS x (BAX - BAS); where FPS = pounds of finished product shipped, BAX = pounds of blowing agent retained per pound of finished product at the end of the extrusion process (winder), and BAS = pounds of blowing agent retained per pound of finished product upon shipment. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

3. Permittee shall maintain records to document compliance with the fugitive warehouse VOC emission limit. [District Rules 1670 and 2080] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-334-19-1

EXPIRATION DATE: 01/31/2013

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

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit

2. Visible emissions from the exhaust of the dust collector serving the autosaw operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit

3. Dust collector exhaust fan(s) shall be switched on prior to the start-up of autosaw operation. [District Rule 2201] Federally Enforceable Through Title V Permit

4. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

5. All filters shall be properly maintained and must be in place during the autosaw operation(s). [District Rule 2201] Federally Enforceable Through Title V Permit

6. Replacement cartridge filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit

7. PM10 emissions from the dust collector shall not exceed 0.01 gr/dscf. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit

8. Air flow rate to dust collector shall not exceed 1900 scfm. [District Rule 2201] Federally Enforceable Through Title V Permit

9. The dust collector(s) shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit

10. Dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit

11. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

12. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2201] Federally Enforceable Through Title V Permit

13. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
14. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

15. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit

16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
<table>
<thead>
<tr>
<th>PERMIT NUMBER</th>
<th>FEE DESCRIPTION</th>
<th>FEE RULE</th>
<th>QTY</th>
<th>Fee Amount</th>
<th>Fee Total</th>
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<tr>
<td>S-334-1-2</td>
<td>12,000 GALLONS</td>
<td>3020-05 B</td>
<td>1</td>
<td>93.00</td>
<td>93.00</td>
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<td>BUTANE STORAGE OPERATION WITH ONE 12,000 GALLON STORAGE TANK</td>
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<td>EAST BUILDING RESIN TRANSFER AND STORAGE OPERATION WITH RAILCAR UNLOADING; RECLAIM RECEIVING LINE FROM S-334-6; SIX STORAGE SILOS, FOUR DRYERS, SEVEN DAY BINS (EACH STORAGE SILO, DRYER, AND DAY BIN HAVE ONE PELLET RECEIVER); TEN VACUUM PUMPS WITH INLINE FILTER; AND FOUR PELLET RECEIVERS SERVING SHEET EXTRUDERS LISTED ON S-334-3, S-334-11, AND S-334-15</td>
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<tr>
<td>S-334-3-12</td>
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<td>1</td>
<td>815.00</td>
<td>815.00</td>
<td>A</td>
<td>FOAMED PLASTIC EXTRUSION OPERATION #61 INCLUDING ONE BLENDER AND ENCLOSED EXTRUDER DIE VENTED TO 40,000 SCFM CONTROLLED ENVIRONMENT EQUIPMENT CORPORATION REGENERATIVE THERMAL OXIDIZER SHARED WITH PERMITS S-334-6, -7, -8, -11, -13, AND -15</td>
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<td>S-334-4-2</td>
<td>265 HP EXTRUSION SYSTEM</td>
<td>3020-01 E</td>
<td>1</td>
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<td>D</td>
<td>265 HP EXTRUSION OPERATION (#2) WITH ONE BLENDER VENTED TO OXIDIZER (SHARED WITH PERMIT UNIT S-334-3)</td>
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<td>3,720,000 BTU/HR</td>
<td>3020-02 F</td>
<td>1</td>
<td>607.00</td>
<td>607.00</td>
<td>D</td>
<td>3.72 MMBTU/HR ELLIOT THERMO CATALYTIC OXIDIZER MODEL CCSRI-120M SABH-54 WITH 30 HP CHICAGO MODEL SQA 24.5 CLASS II</td>
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<td>314.00</td>
<td>314.00</td>
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<td>FOAMED PLASTIC RECLAIM OPERATION INCLUDING DAVIS STANDARD RECLAIM EXTRUDER, SHREDDER, CRAMMER FEEDER, GRANUTEC GRANULATOR VENTED TO FOUR CYCLONES, FOUR ENCLOSED METAL SILOS, SHARED BAGHOUSE LISTED ON PERMIT S-334-13, AND SHARED OXIDIZER LISTED ON PERMIT S-334-3</td>
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<td>FOAMED PLASTIC RECLAIM OPERATION INCLUDING PTI MODEL CPF-3000 RECLAIM EXTRUDER, PNEUMATIC TRIM FEED FROM LAMINATOR S-334-13, SHREDDER, CRAMMER FEEDER VENTED TO TWO CYCLONES, TWO ENCLOSED METAL SILOS, SHARED BAGHOUSE LISTED ON PERMIT S-334-13, AND SHARED OXIDIZER LISTED ON S-334-3</td>
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<td>384 Electric Horsepower</td>
<td>3020-01 E</td>
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<td>412.00</td>
<td>412.00</td>
<td>A</td>
<td>FOAMED PLASTIC PLANK EXTRUSION OPERATION #1 INCLUDING ONE BLENDER, NRM PACEMAKER III EXTRUDER WITH ENCLOSURE AROUND DIE END OF EXTRUDER DIE VENTED TO SHARED OXIDIZER LISTED ON S-334-3, AND HEATED PLANK AGING ROOM VENTED TO SHARED OXIDIZER LISTED ON S-334-3</td>
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<td>S-334-9-0</td>
<td>135 HP PLANK EXTRUDER P2</td>
<td>3020-01 D</td>
<td>1</td>
<td>314.00</td>
<td>314.00</td>
<td>D</td>
<td>135 HP WILMINGTON EXTRUDER (#2) WITH BLENDER AND HOODED FORMING TABLE VENTED TO OXIDIZER (SHARED WITH PERMIT UNIT S-334-3)</td>
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<td>FEE DESCRIPTION</td>
<td>FEE RULE</td>
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<td>AMOUNT</td>
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<td>55 hp</td>
<td>3020-01 C</td>
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<td>RESIN TRANSFER AND STORAGE OPERATION (WEST BUILDING), WITH RAILCAR UNLOADING, RECLAIM RECEIVING, 6 STORAGE SILOS, 2 DRYERS, 4 DAY BINS EACH WITH A PELLET RECEIVER, 4 VACUUM PUMPS, AND PLANK EXTRUDER P1 SERVED BY PELLET RECEIVER(S)</td>
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<td>FOAMED PLASTIC EXTRUSION OPERATION #3 including one BLENDER, PERMANENT TOTAL ENCLOSURE FOR EXTRUDER DIE VENTED TO SHARED OXIDIZER LISTED ON PERMIT S-334-3, AND HEATED AGING ROOM, SHARED WITH S-334-15, VENTED TO SHARED OXIDIZER LISTED ON PERMIT S-334-3</td>
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<td>49.75 HP</td>
<td>3020-01 B</td>
<td>1</td>
<td>117.00</td>
<td>117.00</td>
<td>D</td>
<td>49.75 HP JSP EXTRUDER MODEL 12T90 WITH A BERRINGER PELLETIZER MODEL WRP12V FOAM RECLAIMER AND A PNEUMATIC TRIM FEED FROM LAMINATOR, VENTED TO OXIDIZER (SHARED WITH PERMIT UNIT S-334-3)</td>
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<td>3020-01 D</td>
<td>1</td>
<td>314.00</td>
<td>314.00</td>
<td>A</td>
<td>R-LAM LAMINATOR AND SAWING OPERATION WITH FARR MODEL GS-8 DUST COLLECTOR VENTED TO RTO LISTED ON S-334-3 AND FARR CORPORATION BAGHOUSE SHARED WITH PERMIT UNITS S-334-6 AND 1-7 VENTED TO RTO LISTED ON S-334-3</td>
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<tr>
<td>S-334-14-1</td>
<td>26 hp</td>
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<td>117.00</td>
<td>117.00</td>
<td>A</td>
<td>EDGEFOAM MACHINING LINE #2 WITH A SPLICING TABLE, NOTCHING MACHINE, LAMINATOR, V-GROOVE TRIM SAW VENTED TO DUST COLLECTOR, AND CROSS-GROOVE SAW VENTED TO DUST COLLECTOR</td>
</tr>
<tr>
<td>S-334-15-2</td>
<td>381.75 electric horsepower</td>
<td>3020-01 E</td>
<td>1</td>
<td>412.00</td>
<td>412.00</td>
<td>A</td>
<td>FOAMED PLASTIC EXTRUSION OPERATION #4 including one BLENDER AND ENCLOSED EXTRUDER DIE VENTED TO SHARED OXIDIZER LISTED ON PERMIT S-334-3 AND EXTRUDED SHEET AGING ROOM, SHARED WITH S-334-11, VENTED TO OXIDIZER LISTED ON PERMIT S-334-3</td>
</tr>
<tr>
<td>S-334-16-1</td>
<td>13.26 electric horsepower</td>
<td>3020-01 A</td>
<td>1</td>
<td>87.00</td>
<td>87.00</td>
<td>A</td>
<td>36&quot; AUTOSAW OPERATION WITH AUTOSAW SERVED BY A 5 HP MURPHY-ROGERS MODEL MRT-9A DUST COLLECTOR</td>
</tr>
<tr>
<td>S-334-17-1</td>
<td>10.75 electric horsepower</td>
<td>3020-01 A</td>
<td>1</td>
<td>87.00</td>
<td>87.00</td>
<td>A</td>
<td>EDGEFOAM OPERATION WITH EDGEFOAM MACHINE #1 SERVED BY A 3 HP SOCO MACHINERY MODEL SAC-2041 DUCT COLLECTOR AND 5 HP QUICKDRAFT MODEL MH557 SCRAP REMOVAL VACUUM SYSTEM</td>
</tr>
<tr>
<td>S-334-18-1</td>
<td>warehouse</td>
<td>3020-06</td>
<td>1</td>
<td>105.00</td>
<td>105.00</td>
<td>A</td>
<td>POLYETHYLENE FOAM WIP AND FINISHED GOODS WAREHOUSE</td>
</tr>
<tr>
<td>S-334-19-1</td>
<td>3 hp</td>
<td>3020-01 A</td>
<td>1</td>
<td>87.00</td>
<td>87.00</td>
<td>A</td>
<td>72&quot; AUTOSAW OPERATION WITH AUTOSAW SERVED BY A 3 HP JET EQUIPMENT DC-1900-3 DUST COLLECTOR WITH MODEL 708639 CARTRIDGE FILTERS</td>
</tr>
</tbody>
</table>

Number of Facilities Reported: 1