

September 6, 2022

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

**Re: Notice of Final Action - Title V Permit Renewal**  
**Facility Number: N-257**  
**Project Number: N-1204194**

Dear Mr. Crookham:

The District has issued the Final Renewed Title V Permit for Dart Container Corporation (see enclosure). The preliminary decision for this project was made on July 6, 2022. No comments were received following the District's preliminary decision on this project.

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

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

Sincerely,



Brian Clements  
Director of Permit Services

Enclosures

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

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

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

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-8000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: (861) 392-5500 FAX: (861) 392-5585

# Permit to Operate

**FACILITY:** N-257

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

**LEGAL OWNER OR OPERATOR:**

DART CONTAINER CORPORATION

**MAILING ADDRESS:**

1400 E VICTOR RD  
LODI, CA 95240

**FACILITY LOCATION:**

1400 E VICTOR RD  
LODI, CA 95240

**FACILITY DESCRIPTION:**

STYROFOAM CONTAINERS MANUFACTURING

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

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

**Samir Sheikh**  
Executive Director / APCO

**Brian Clements**  
Director of Permit Services

# San Joaquin Valley Air Pollution Control District

**FACILITY:** N-257-0-4

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

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1 and San Joaquin County Rule 110] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0 and San Joaquin County Rule 110] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0]
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040]
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: DART CONTAINER CORPORATION  
Location: 1400 E VICTOR RD, LODI, CA 95240  
N-257-0-4 : Sep 2 2022 3:44PM -- AIYABEIJ

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, or repackage for use within the District; or supply, sell, market, or offer for sale within the District; or solicit for application or apply within the District any architectural coating or colorant with a VOC content in excess of the corresponding limit specified in Table 1 or Table 2, after the specified effective date in Table 1 or Table 2 of District Rule 4601 (4/16/20). [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to District Rule 4601 shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the applicable administrative requirements specified Section 6.0 of District Rule 4601. [District Rule 4601, 6.0] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with the permit conditions in the Title V permit shall be deemed compliance with the following outdated SIP requirements: San Joaquin County Rules 401 and 110. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin on December 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. Facility-wide daily NO<sub>x</sub> emissions shall not exceed 150 pounds in any one day. Facility-wide daily NO<sub>x</sub> emissions from the 14.65 MMBtu/hr Boiler (N-257-4) and the 29.3 MMBtu/hr Boiler (N-257-5) shall be calculated as follows: Daily NO<sub>x</sub> Emissions = [(0.011 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0512 x Daily Fuel Oil Combusted (MMBtu per day))] + [(0.008 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0512 x Daily Fuel Oil Combusted (MMBtu per day))]. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Facility-wide daily VOC emissions excluding the warehouse emissions shall not exceed 250 pounds in any one day. Facility-wide daily VOC emissions from the 14.65 MMBtu/hr Boiler (N-257-4) and the 29.3 MMBtu/hr Boiler (N-257-5) shall be calculated as follows: Daily VOC Emissions = [(0.0042 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0045 x Daily Fuel Oil Combusted (MMBtu per day))] + [(0.0042 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0045 x Daily Fuel Oil Combusted (MMBtu per day))]. [District NSR Rule] Federally Enforceable Through Title V Permit
45. The permittee shall maintain daily records of the calculated daily facility-wide NO<sub>x</sub> and VOC emissions. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
46. Records of the daily facility-wide NO<sub>x</sub> and VOC emissions shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

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

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

# San Joaquin Valley Air Pollution Control District

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

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

# San Joaquin Valley Air Pollution Control District

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

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. The SO<sub>x</sub> emissions, while firing on #2 fuel oil, shall not exceed 0.0016 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM<sub>10</sub> emissions, while firing on #2 fuel oil, shall not exceed 0.015 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Operational characteristics recommended by the manufacturer and approved by the District shall be monitored on at least a monthly basis. [District Rule 4320, 5.7.2] Federally Enforceable Through Title V Permit
18. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operation or conditions specified in the Permit-to-Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent by volume and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
25. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

# San Joaquin Valley Air Pollution Control District

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

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

**EQUIPMENT DESCRIPTION:**

121,680 SQ FT FINAL STYROFOAM PRODUCT STORAGE WAREHOUSE

## PERMIT UNIT REQUIREMENTS

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

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

# San Joaquin Valley Air Pollution Control District

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

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

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

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