MAR 15 2011

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

Re: Notice of Preliminary Decision – Title V Permit Renewal
District Facility # N-257
Project # N-1084074

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Dart Container Corporation for its styrofoam cup and container manufacturer at 1400 E Victor Road in Lodi, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

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

Sincerely,

[Signature]

David Warner
Director of Permit Services

Attachments
C: Renald Harris, Permit Services Engineer

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-2044
Tel: (559) 230-6000 FAX: (559) 230-9081

Southern Region
34948 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5385

www.valleyair.org www.healthyairliving.com
MAR 15 2011

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # N-257
Project # N-1084074

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Dart Container Corporation for its styrofoam cup and container manufacturer at 1400 E Victor Road in Lodi, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

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

Sincerely,

David Warner
Director of Permit Services

Attachments
C: Renald Harris, Permit Services Engineer

Seyed Sadedin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-8061

Southern Region
34945 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.valleyair.org www.healthyairliving.com
MAR 15 2011

Ronald Cookham  
Dart Container Corporation  
1400 East Victor Road  
Lodi, CA

Re: Notice of Preliminary Decision - Title V Permit Renewal  
District Facility # N-257  
Project # N-1084074

Dear Mr. Cookham:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Dart Container Corporation for its styrofoam cup and container manufacturer at 1400 E Victor Road in Lodi, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

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

Sincerely,

[Signature]

David Warner  
Director of Permit Services

Attachments  
C: Renald Harris, Permit Services Engineer
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 Dart Container Corporation for its styrofoam cup and container manufacturer at 1400 E Victor Road in Lodi, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1084074, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. 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 by the public, the District will hold a public hearing regarding issuance of this renewed permit. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. Written comments on the proposed renewed permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.
# TABLE OF CONTENTS

1. PROPOSAL ........................................................................................................... 2
2. FACILITY LOCATION ...................................................................................... 2
3. EQUIPMENT LISTING ....................................................................................... 3
4. GENERAL PERMIT TEMPLATE USAGE .............................................................. 3
5. SCOPE OF EPA AND PUBLIC REVIEW ............................................................... 3
6. FEDERALLY ENFORCEABLE REQUIREMENTS ................................................... 3
7. REQUIREMENTS NOT FEDERALLY ENFORCEABLE ............................................ 5
8. PERMIT REQUIREMENTS ................................................................................... 6
9. PERMIT SHIELD ............................................................................................... 37
10. PERMIT CONDITIONS ..................................................................................... 37
11. ATTACHMENTS ............................................................................................... 37

A. DRAFT RENEWED TITLE V OPERATING PERMIT
B. PREVIOUS TITLE V OPERATING PERMIT
C. DETAILED FACILITY LIST
D. DISTRICT RULE 4601 STREAMLINING
E. DISTRICT RULE 4682 STREAMLINING
TITLE V PERMIT RENEWAL EVALUATION
Styrofoam Cup and Container Manufacturing

Engineer: Renald Harris
Date: February 28, 2011

Facility Number: N-257
Facility Name: Dart Container Corporation
Mailing Address: 1400 E Victor Road
Lodi, CA 95240

Contact Name: Ronald Cookham
Phone: (209) 333-8088

Responsible Official: Ronald Cookham
Title: Plant Manager

Project #: N-1084074
Deemed Complete: November 3, 2008

I. PROPOSAL

Dart Container Corporation was issued a Title V permit on November 30, 2004. 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

Dart Container Corporation is located at 1400 E Victor Road in Lodi, 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 does not propose to use any model general permit templates.

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated

- District Rule 2020, Exemptions (amended December 19, 2002 ⇒ amended December 20, 2007)


- District Rule 4101, Visible Emissions (amended December 17, 1992 ⇒ amended February 17, 2005)

- District Rule 4601, Architectural Coatings (amended December 17, 1992 ⇒ amended December 17, 2009)

- District Rule 4682, Polystyrene Foam, Polyethylene, and Polypropylene Manufacturing (amended June 16, 1994 ⇒ September 20, 2007)


- 40 CFR Part 82, Subpart B, Stratospheric Ozone (amended November 9, 2007)
• 40 CFR Part 82, Subpart F, Stratospheric Ozone (amended June 8, 2008)

B. Rules Removed

• District Rule 8020, 8030, and 8060, Fugitive Dust (PM$_{10}$) Emissions (amended April 25, 1996)

These rules were removed on November 15, 2001 and were replaced with District Rules 8021, 8031, and 8061.

C. Rules Added

• District Rule 4306, Boilers, Steam Generators, Process Heaters (amended October 16, 2008)

• District Rule 4320, Advanced Emission Reduction Options For Boilers, Steam Generators, And Process Heaters Greater Than 5.0 MMBtu/hr (amended October 16, 2008)

• District Rule 8011, General Requirements (amended August 19, 2004)

• District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities (amended August 19, 2004)

• District Rule 8031, Bulk Materials (amended August 19, 2004)

• District Rule 8041, Carryout and Trackout (amended August 19, 2004)

• District Rule 8051, Open Areas (amended August 19, 2004)

• District Rule 8061, Paved and Unpaved Roads (amended August 19, 2004)

• District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (amended September 16, 2004)

D. Rules Not Updated

• District Rule 1070, Inspections (amended December 17, 1992)

• 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 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 4201, Particulate Matter Concentration (amended December 17, 1992)
• District Rule 4202, Particulate Matter - Emission Rate (amended December 17, 1992)
• District Rule 4801, Sulfur Compounds (amended December 17, 1992)
• 40 CFR Part 68, Chemical Accident Prevention

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

District Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater Than 5.0 MMBtu/hr, (adopted October 16, 2008)

The purpose of this rule is to limit emissions of oxides of nitrogen (NOx), carbon monoxide (CO), oxides of sulfur (SO2), and particulate matter 10 microns or less (PM10) from boilers, steam generators, and process heaters.

The rule was adopted on October 16, 2008 and has not yet been approved into the State Implementation Plan (SIP).
a. N-257-4-5: 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 RECYCULATION

Conditions 4, 5, 7, 8, 11 through 15, 17 through 20, and 22 through 28 of the requirements for this unit are based on District Rule 4320 and will therefore not be discussed any further.

b. N-257-5-6: 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 RECYCULATION

Conditions 5 through 8, 12, 13, 17 through 21, 23, 25 through 36 and 38 of the requirements for this unit are based on District Rule 4320 and will therefore not be discussed any further.

B. Rules Not Updated

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

Condition 42 of permit units -0-2 and condition 1 of permit unit -6-3 are based on District Rule 4102 and will therefore 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 2020 - Exemptions

District Rule 2020 lists equipment which are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any affect on current permit requirements and will therefore not be addressed in this evaluation.
B. 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.

a. N-257-0-2: FACILITYWIDE REQUIREMENTS.

Conditions 43 and 44 have been updated to support recordkeeping conditions added.

b. N-257-2-3. 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.
• The requirements of conditions 7 through 9, 11 through 19, 21 through 25, 27, 32, 33, 36 through 38, 43, 47, 49, and 50 from the current PTO have been included as conditions 7 through 9, 11 through 19, 21 through 25, 27, 32, 33, 36 through 38, 43, 47, 49, and 50 of the requirements for this permit unit.

b. N-257-4-5: 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

• The requirements of conditions 1, 3, 4, 6, 10, 11, and 12 from the current PTO have been included as conditions 1, 3, 4, 6, 10, 11, and 12 of the requirements for this permit unit.

c. N-257-5-6: 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

• The requirements of conditions 2, 3, 4, and 6 through 16 from the current PTO have been included as conditions 2, 3, 4, and 6 through 16 of the requirements for this permit unit.

C. District Rule 2520 - Federally Mandated Operating Permits

This rule was recently amended to incorporate several administrative corrections, clarify rule language, and add procedures for implementing compliance schedules. The only amendments to this rule that will have an effect on current permit requirements are the corrections to Section 9 rule references, as described in the following table:

<table>
<thead>
<tr>
<th>Old Rule Section</th>
<th>Corrected Rule Section</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.3</td>
<td>9.2</td>
</tr>
<tr>
<td>9.4</td>
<td>9.3</td>
</tr>
<tr>
<td>9.5</td>
<td>9.4</td>
</tr>
<tr>
<td>9.6</td>
<td>9.5</td>
</tr>
<tr>
<td>9.7</td>
<td>9.6</td>
</tr>
<tr>
<td>9.8</td>
<td>9.7</td>
</tr>
<tr>
<td>9.9</td>
<td>9.8</td>
</tr>
</tbody>
</table>
Rule 2520, Section 6.4.4, "Other Changes Not Requiring Title V Permit Amendment," allowed the permittee to implement changes, including the addition of new emissions units, without triggering the permit modification or amendment requirements until the time of Title V permit renewal, provided the conditions described in Sections 6.4.4.1 through 6.4.4.2 were met.

The following permit requirements were added and/or revised to ensure compliance with this rule:

a. N-257-0-2: FACILITYWIDE REQUIREMENTS.
   - Conditions 5, 8 through 21, 26 and 36 through 41 on the existing permit to operate have been revised to include the updated Section 9 rule references.
   - Add recordkeeping conditions 45 and 46 for specific limiting conditions 43 and 44.

c. N-257-2-3: EXPANDABLE POLYSTYRENE (EPS) PROCESSING OPERATION: ENCLOSSED 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; ENCLOSSED 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
• Conditions 10, 34 through 36, 39 through 42, 47, and 48 on the existing permit to operate have been revised to include the updated Section 9 rule references.

e. N-257-4-5: 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

• Conditions 8 and 9 on the existing permit to operate have been revised to include the updated Section 9 rule references.

f. N-257-5-6: 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

• The requirements of conditions 24 and 40 from the current PTO have been included as conditions 22 and 38 of the requirements for this permit unit. Conditions 22 and 38 on this permit to operate have been revised to include the updated Section 9 rule references.

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

D. District Rule 4101 - Visible Emissions

District Rule 4101 was approved by EPA on August 11, 2005 to replace SIP approved Rule 401 (all counties of the SJVUAPCD).

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than the smoke described in Section 5.1 of Rule 4101.

The following permit requirement, which is based on this rule, has been revised as follows:
a. C-36-0-2:  **FACILITYWIDE REQUIREMENTS**

- Condition 22 on the existing permit to operate has been revised to remove the outdated County Rule 401 from the citation section.

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

This rule applies to any boiler, steam generator or process heater, with a rated heat input greater than 5 million Btu per hour that is fired with gaseous and/or liquid fuels. This rule was amended in October 16, 2008 with the following amendments.

Section 5.1 requires that NO\(_x\) and CO emissions shall not exceed the limits specified in Table 1. For units with a rated heat input equal to or less than 20.0 MMBtu/hr (Table 1 Category A), NO\(_x\) and CO emissions shall not exceed 15 ppmv and 400 ppmv, respectively. Units emissions, limited to an annual heat input of 9 billion Btu/year to 30 billion Btu/year (Table 1, Category H), shall not exceed 30 ppmv NO\(_x\) per year and 400 ppmv CO per year.

Section 5.3 states that emission limits shall not apply during start-up or shutdown provided an operator complies with the requirements that the duration of each start-up or each shutdown shall not exceed two hours, the emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown, and an operator may submit an application for a permit condition to allow more than two hours for each start-up or each shutdown provided the operator meets all of the conditions specified in Sections 5.3.3.1 through 5.3.3.3.

Section 5.4 requires that operators of any unit subject to the applicable emission limits of the rule shall install and maintain an operational APCO approved Continuous Emissions Monitoring System (CEMS) for NO\(_x\), CO, and oxygen, or implement an APCO-approved Alternate Monitoring System. The operator of any Category H units shall install and maintain an operational non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit.

Section 6.1 requires that records required by Sections 6.1.1 through 6.1.4 shall be maintained for five calendar years and shall be made available to the APCO upon request.

Section 6.2 identifies the applicable test methods.
Section 6.3 requires that units subject to the requirements in Sections 5.1 or 5.2.3 shall be source tested to determine compliance with the applicable emission limits at least once every 12 months.

The following permit requirements ensure compliance with this rule:

a. N-257-4-5: 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
   • Conditions 5, 7, 11 through 15, 17 through 20, 22 through 25 and 28 assure compliance with the requirements of this rule.

b. N-257-5-6: 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
   • Conditions 5, 18 through 21, 23, 25, 26, 27, 29 through 32 35, 36, and 38 assure compliance with the requirements of this rule.

F. District Rule 4601 - Architectural Coatings

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of any architectural coating to no more than what is listed in the Table of Standards (Section 5.0). The following analysis shows that the proposed requirement of the current District Rule 4601 is more stringent than SIP approved version of District Rule 4601. Streamlining procedures, as documented in the following steps is utilized to substitute the proposed set of requirements for the otherwise applicable requirements.

The following table has side-by-side comparison of applicable requirements:

<table>
<thead>
<tr>
<th>Requirement Category</th>
<th>SIP Version of Rule 4601 (10/31/01)</th>
<th>Non-SIP Version of Rule 4601 (12/17/09)</th>
<th>Conclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.0 Applicability</td>
<td>This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures any architectural coating for use within the District.</td>
<td>This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.</td>
<td>No change in the applicability, therefore, non-SIP version of rule is as stringent as SIP version.</td>
</tr>
<tr>
<td>4.0 Exemptions</td>
<td>The provisions of this rule shall not apply to: 4.1 Any architectural coating that is sold or</td>
<td>4.1 The provisions of this rule shall not apply to:</td>
<td>The only change is to require reporting</td>
</tr>
</tbody>
</table>

12
<table>
<thead>
<tr>
<th>Requirement Category</th>
<th>SIP Version of Rule 4601 (10/31/01)</th>
<th>Non-SIP Version of Rule 4601 (12/17/09)</th>
<th>Conclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1.1 Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</td>
<td>4.1.1</td>
<td>Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</td>
<td>requirements as discussed in Section 6.2 of the non-SIP approved version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</td>
</tr>
<tr>
<td>4.2 Any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less.</td>
<td>4.2</td>
<td>With the exception of Section 6.2, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less.</td>
<td></td>
</tr>
<tr>
<td>4.3 Any aerosol coating product.</td>
<td>4.3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

5.0 Requirements

Note: Section 5.0 requirements refer to Table of Standards, Table of Standards 1, and Table of Standards 2. These tables are included as Attachment D.

5.1 VOC Content Limits: Except as provided in Sections 5.2, 5.3, 5.8 and 8.0, no person shall:
- manufacture, blend, or repackage for sale within the District;
- supply, sell, or offer for sale within the District;
- solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards, after the specified effective date in the Table of Standards.

5.1 | VOC Content Limits: Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, or offer for sale within the District; or solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards 1 or the Table of Standards 2 after the specified effective date in the Table of Standards 1 or the Table of Standards 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.

5.2 Most Restrictive VOC Limit: If anywhere on the container of any architectural coating, or any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf, any representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed in the Table of Standards, then the most restrictive VOC content limit shall apply. This provision does not apply to the following coating categories:
- Lacquer coatings (including lacquer sanding sealers)
- Metallic pigmented coatings
- Shellacs
- Fire-retardant coatings
- Pretreatment wash primers
- Industrial maintenance coatings
- Low-solids coatings
- Wood preservatives
- High temperature coatings
- Temperature-indicator safety coatings
- Antenna coatings
- Antifouling coatings
- Flow coatings
- Bituminous roof primers
- Specially primers, sealers and

5.2 | Most Restrictive VOC Limit: If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in the Table of Standards 1 or the Table of Standards 2, then that coating is not required to meet the VOC limits for Flat, Nonflat, or Nonflat – High Gloss coatings, but is required to meet the VOC limit for the applicable specialty coating listed in the Table of Standards 1 or the Table of Standards 2.

5.2 | Most Restrictive VOC Limit: If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in the Table of Standards 1 or the Table of Standards 2, then that coating is not required to meet the VOC limits for Flat, Nonflat, or Nonflat – High Gloss coatings, but is required to meet the VOC limit for the applicable specialty coating listed in the Table of Standards 1 or the Table of Standards 2.

5.2.1 Effective until December 31, 2010, with the exception of the specialty coating categories specified in Section 5.2.3.1 through 5.2.3.15, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 1, the most restrictive (or lowest) VOC content limit shall apply.

5.2.2 Effective on and after January 1, 2011, with the exception of the specialty coating categories specified in Sections 5.2.3.3, 5.2.3.5 through 5.2.3.9, and 5.2.3.14 through 5.2.3.18, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 2, the most restrictive (or lowest) VOC content limit shall apply.

The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
<table>
<thead>
<tr>
<th>Requirement Category</th>
<th>SIP Version of Rule 4601 (10/31/01)</th>
<th>Non-SIP Version of Rule 4601 (12/17/09)</th>
<th>Conclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>undercoaters</td>
<td>restrictive (or lowest) VOC content limit shall apply. 5.2.3 This requirement applies to: usage recommendations that appear anywhere on the coating container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf. 5.2.3.1 Lacquer coatings (including lacquer sanding sealers) 5.2.3.2 Metallic pigmented coatings 5.2.3.3 Shellacs 5.2.3.4 Fire-retardant coatings 5.2.3.5 Pretreatment wash primers 5.2.3.6 Industrial maintenance coatings 5.2.3.7 Low-solids coatings 5.2.3.8 Wood preservatives 5.2.3.9 High temperature coatings 5.2.3.10 Temperature-indicator safety coatings 5.2.3.11 Antenna coatings 5.2.3.12 Antifouling coatings 5.2.3.13 Flow coatings 5.2.3.14 Bituminous roof primers 5.2.3.15 Specialty primers, sealers and undercoaters 5.2.3.16 Aluminum roof coatings 5.2.3.17 Zinc-rich primers 5.2.3.18 Wood Coatings</td>
<td></td>
</tr>
<tr>
<td>5.3 Sell-Through of Coatings: 5.3.1 A coating manufactured prior to the January 1, 2003 or January 1, 2004 effective date specified for that coating in the Table of Standards may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1. 5.3.2 A coating included in an approved Averaging Program that does not comply with the specified limit in the Table of Standards may be sold, supplied, or offered for sale for up to three years after the end of the compliance period specified in the</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.3 Sell-Through of Coatings: A coating manufactured prior to the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2, and that complied with the standards in effect at the time the coating was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2 may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1.</td>
<td>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Section 5.3.2 was removed it is no longer applicable in the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4601 (10/31/01)</td>
<td>Non-SIP Version of Rule 4601 (12/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>-----------------------------------</td>
<td>----------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC containing materials used for thinning and cleanup shall also be closed when not in use.</td>
<td>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.</td>
<td>No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.</td>
<td></td>
</tr>
<tr>
<td>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards.</td>
<td>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards 1 or the Table of Standards 2.</td>
<td>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</td>
<td></td>
</tr>
<tr>
<td>5.6 Rust Preventative Coatings: Effective January 1, 2004, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards.</td>
<td>5.6 Rust Preventative Coatings: Effective through December 31, 2010, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards 1.</td>
<td>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</td>
<td></td>
</tr>
<tr>
<td>5.7 Coatings Not Listed in the Table of Standards: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards, the VOC content limit shall be determined by classifying the coating as a flat coating or a nonflat coating, based on its gloss, as defined in Sections 3.21, 3.36 and 3.37 and the corresponding flat or nonflat VOC limit shall apply.</td>
<td>5.7 Coatings Not Listed in the Table of Standards 1 or the Table of Standards 2: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards 1 or the Table of Standards 2, the VOC content limit shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat – High Gloss coating, based on its gloss, and the corresponding Flat, Nonflat, or Nonflat – High Gloss VOC limit in the Table of Standards 1 or the Table of Standards 2 shall apply.</td>
<td>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</td>
<td></td>
</tr>
<tr>
<td>5.8 Lacquers: Notwithstanding the provisions of Section 3.1, a person or facility may add up to 10 percent by volume of VOC to a lacquer to avoid blushing of the finish during days with relative humidity greater</td>
<td>---</td>
<td>This section has been removed. The operation is required to meet the lacquer VOC limit regardless of</td>
<td></td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4601 (10/31/01)</td>
<td>Non-SIP Version of Rule 4601 (12/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>-------------------------------------</td>
<td>------------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>than 70 percent and temperature below 65°F, at the time of application, provided that the coating contains acetone and no more than 550 grams of VOC per liter of coating, less water and exempt compounds, prior to the addition of VOC.</td>
<td></td>
<td>temperature and humidity. Therefore, non-SIP version of rule is as stringent as SIP version</td>
<td></td>
</tr>
<tr>
<td>5.9 Averaging Compliance Option: On or after January 1, 2003, in lieu of compliance with the specified limits in The Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; bituminous roof coatings; rust preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in Section 8.0, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section 5.9 and Section 8.0 shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.</td>
<td></td>
<td>This section is removed from the non-SIP version, it is no longer applicable. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
<td></td>
</tr>
<tr>
<td>5.8 Prior to January 1, 2011, any coating that meets a definition in Section 3.0 for a coating category listed in the Table of Standards 2 and complies with the applicable VOC limit in the Table of Standards 2 and with Sections 5.2 and 6.1 (including those provision of Section 6.1 otherwise effective on January 1, 2011) shall be considered in compliance with this rule</td>
<td></td>
<td>Table of Standards 2 is more stringent than the VOC limits of Table of Standards in the SIP Approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
<td></td>
</tr>
<tr>
<td>Table of Standards (See Attachment D for Table)</td>
<td>Table of Standards 1 (Effective through 12/31/10) (See Attachment D for Table)</td>
<td>The non-SIP rule requirements are the same as the Table of Standards in the SIP approved rule, except Table of Standards 1 expires at which time Table of Standards 2 is in effect. As discussed below these standards are more stringent. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Table of Standards 2 (Effective on and after 1/1/11) (See Attachment D for Table)</td>
<td>The requirements of Table of Standards 2 are more stringent than the Table of Standards in the SIP rule. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
<td></td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4601 (10/31/01)</td>
<td>Non-SIP Version of Rule 4601 (12/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>-------------------------------------</td>
<td>------------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>6.0 Administrative Requirements</td>
<td>6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections 6.1.1 through 6.1.9 on the coating container (or label) in which the coating is sold or distributed.</td>
<td>6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections 6.1.1 through 6.1.14 on the coating container (or label) in which the coating is sold or distributed.</td>
<td>The non-SIP approved rule contain sections listed in the SIP rule plus additional requirements not found in the SIP version. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
</tr>
<tr>
<td>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</td>
<td>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</td>
<td>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.3 VOC Content: Each container of any coating subject to this rule shall display either the maximum or actual VOC content of the coating, as supplied, including the maximum thinning as recommended by the manufacturer. VOC content shall be displayed in grams of VOC per liter of coating. VOC content displayed shall be calculated using product formulation data, or shall be determined using the test methods in Section 6.3.</td>
<td>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</td>
<td>6.1.3.2 VOC Content, as determined from actual formulation data; or</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.4 Industrial Maintenance Coatings: In addition to the information specified in Sections 6.1.1, 6.1.2 and 6.1.3. each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.4.1 through 6.1.4.3.</td>
<td>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains solanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.4.1 &quot;For industrial use only&quot;</td>
<td>6.1.4.4 Faux Finishing Coatings: Effective January 1, 2011, the labels of all clear topical Faux Finishing coatings shall prominently display the</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.4.2 &quot;For professional use only&quot;</td>
<td>6.1.4.5 Rust Preventative Coatings: Effective January 1, 2003, the labels of all rust</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.4.3 &quot;Not intended for residential use&quot;</td>
<td>6.1.4.5 Rust Preventative Coatings: Effective January 1, 2003, the labels of all rust</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4601 (10/31/01)</td>
<td>Non-SIP Version of Rule 4601 (12/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>--------------------------------------</td>
<td>----------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>preventative coatings shall prominently display the statement “For Metal Substrates Only”</td>
<td>statement &quot;This product can only be sold or used as part of a Faux Finishing coating system&quot;.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.7 Specialty Primers, Sealers and Undercoaters: Effective January 1, 2003, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the descriptions listed in Section 6.1.7.1 through 6.1.7.5.</td>
<td>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.5.1 through 6.1.5.3.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.7.1 For blocking stains.</td>
<td>6.1.5.1 “For industrial use only”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.7.2 For fire-damaged substrates.</td>
<td>6.1.5.2 “For professional use only”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.7.3 For smoke-damaged substrates.</td>
<td>6.1.5.3 “Not for residential use” or “Not intended for residential use”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.7.4 For water-damaged substrates.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.7.5 For excessively chalky substrates.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.8 Quick Dry Enamels: Effective January 1, 2003, the labels of all quick dry enamels shall prominently display the words “Quick Dry” and the dry hard time.</td>
<td>6.1.6 Clear Brushing Lacquers: The labels of all clear brushing lacquers shall prominently display the statements “For brush application only,” and “This product must not be thinned or sprayed.” (Category deleted effective January 1, 2011.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.9 Non-flat – High Gloss Coatings: Effective January 1, 2003, the labels of all non-flat – high gloss coatings shall prominently display the words “High Gloss”.</td>
<td>6.1.7 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement “For Metal Substrates Only”.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.8 Specialty Primers, Sealers and Undercoaters: Effective until December 31, 2010, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the descriptions listed in Section 6.1.8.1 through 6.1.8.5. Effective on and after January 1, 2011, the labels of all specialty primers, sealers, and undercoaters shall prominently display one or more of the descriptions listed in Sections 6.1.8.1 through 6.1.8.3. On and after January 1, 2011, Sections 6.1.8.4 and 6.1.8.5 will be no longer effective.</td>
<td>6.1.8.1 For fire-damaged substrates.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.8.2 For smoke-damaged substrates.</td>
<td>6.1.8.2 For smoke-damaged substrates.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.8.3 For water-damaged substrates.</td>
<td>6.1.8.3 For water-damaged substrates.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.8.4 For excessively chalky substrates.</td>
<td>6.1.8.4 For excessively chalky substrates.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.8.5 For blocking stains.</td>
<td>6.1.8.5 For blocking stains.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.9 Quick Dry Enamels: The labels of all quick dry enamels shall prominently display the words “Quick Dry” and the dry hard time. (Category deleted effective January 1, 2011.)</td>
<td>6.1.10 Reactive Penetrating Sealers: Effective January 1, 2011, the labels of all Reactive Penetrating Sealers shall prominently display the statement “Reactive Penetrating Sealer:”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4601 (10/31/01)</td>
<td>Non-SIP Version of Rule 4601 (12/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>--------------------------------------</td>
<td>------------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6.1.11 Stone Consolidants: Effective January 1, 2011, the labels of all Stone Consolidants shall prominently display the statement “Stone Consolidant - For Professional Use Only.”</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>6.1.12 Nonflat - High Gloss Coatings: The labels of all Nonflat - high gloss coatings shall prominently display the words “High Gloss.”</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>6.1.13 Wood Coatings: Effective January 1, 2011, the labels of all Wood Coatings shall prominently display the statement “For Wood Substrates Only.”</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>6.1.14 Zinc Rich Primers: Effective January 1, 2011, the labels of all Zinc Rich Primers shall prominently display one or more of the following descriptions listed in Section 6.1.14.1 through 6.1.14.3.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>6.1.14.1 “For industrial use only”</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>6.1.14.2 “For professional use only”</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>6.1.14.3 “Not for residential use” or “Not intended for residential use”</td>
<td></td>
</tr>
</tbody>
</table>

6.2 Reporting Requirements

6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.

6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.

6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.

Until December 31, 2010 both versions of the rule have the same reporting requirements. After that date the non-SIP approved rule includes very specific information to be kept and is required for all architectural coatings. Therefore, non-SIP version of rule is as stringent as SIP version.
<table>
<thead>
<tr>
<th>Requirement Category</th>
<th>SIP Version of Rule 4601 (10/31/01)</th>
<th>Non-SIP Version of Rule 4601 (12/17/09)</th>
<th>Conclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>manufacturer to calculate State sales.</td>
<td>ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</td>
<td></td>
</tr>
<tr>
<td>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</td>
<td>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</td>
<td>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.2.4.2 the product category listed in the Table of Standards to which the coating belongs;</td>
<td>6.2.4.2 the product category listed in the Table of Standards to which the coating belongs;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</td>
<td>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</td>
<td>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</td>
<td>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</td>
<td>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate state sales.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4601 (10/31/01)</td>
<td>Non-SIP Version of Rule 4601 (12/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>--------------------------------------</td>
<td>----------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td></td>
<td>6.2.7 Effective on and after January 1, 2011, Sales Data: All sales data listed in Sections 6.2.7.1 to 6.2.7.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of the ARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17, California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections 6.2.7.1 through 6.2.7.14: 6.2.7.1 the name and mailing address of the manufacturer; 6.2.7.2 the name, address and telephone number of a contact person; 6.2.7.3 the name of the coating product as it appears on the label and the applicable coating category; 6.2.7.4 whether the product is marketed for interior or exterior use or both; 6.2.7.5 the number of gallons sold in California in containers greater than one liter (1.057 quart) and equal to or less than one liter (1.057 quart); 6.2.7.6 the VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed; 6.2.7.7 the names and CAS numbers of the VOC constituents in the product; 6.2.7.8 the names and CAS numbers of any compounds in the product specifically exempted from the VOC definition; 6.2.7.9 whether the product is</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4601 (10/31/01)</td>
<td>Non-SIP Version of Rule 4601 (12/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>------------------------------------</td>
<td>----------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>6.3 Test Methods</td>
<td>6.3 Test Methods</td>
<td>The non-SIP version includes all the requirements of the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</td>
<td></td>
</tr>
<tr>
<td>6.3.1 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.26 and 3.27, the reference method for VOC content is U.S. EPA Method 24, except as provided in Sections 6.3.2 and 6.3.15. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996), incorporated by reference in Section 6.3.14. The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised August 1996), incorporated by reference in Section 6.3.12. To determine the VOC content of a coating, the manufacturer may use U.S. EPA Method 24, or an alternative method as provided in Section 6.3.2, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of a Method 24 test and any other means for determining VOC content, the Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.2. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct a Method 24 analysis.</td>
<td>6.2.7.10 description of resin or binder in the product; 6.2.7.11 whether the coating is a single-component or multi-component product; 6.2.7.12 the density of the product in pounds per gallon; 6.2.7.13 the percent by weight of solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC definition; and 6.2.7.14 the percent by volume of solids, water, and any compounds in the product specifically exempted from the VOC definition.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.3.2 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.1, after review and approved in writing by the staffs of the District, the ARB and the U.S. EPA.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4601 (10/31/01)</td>
<td>Non-SIP Version of Rule 4601 (12/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>-------------------------------------</td>
<td>----------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>6.3.3 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of U.S. EPA Method 24 (40 CFR 59, subpart D, Appendix A), incorporated by reference in Section 6.3.15. This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</td>
<td>6.3.16. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996). The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised 1993), BAAQMD Method 43 (Revised 1996), or BAAQMD Method 41 (Revised 1995), as applicable. To determine the VOC content of a coating, the manufacturer may use EPA Method 24, or an alternative method as provided in Section 6.3.3, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of EPA Method 24 test and any other means for determining VOC content, the EPA Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.3. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct an EPA Method 24 analysis.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.3.4 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM Designation E 84-99, “Standard Test Method for Surface Burning Characteristics of Building Materials” (see Section 3, Fire-Resistant Coating).</td>
<td>6.3.3 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.2.1, after review and approved in writing by the staffs of the District, ARB and EPA, may also be used.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.3.5 Fire Resistance Rating: The fire resistance rating of a fire-resistant coating shall be determined by ASTM Designation E 119-98, “Standard Test Methods for Fire Tests of Building Construction Materials” (see Section 3, Fire-Resistant Coating).</td>
<td>6.3.4 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of SCAQMD Laboratory Methods of Analysis for Enforcement Samples (see Section 3, Metallic Pigmented Coating). This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.3.7 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, SCAQMD Laboratory Methods of Analysis for Enforcement Samples (see Section 3, Metallic Pigmented Coating).</td>
<td>6.3.6 Fire Resistance Rating: The fire resistance rating of a fire-resistant coating shall be determined by ASTM E119-07, “Standard Test Methods for Fire Tests of Building Construction Materials” (see Section 3.0, Fire-Resistant Coating).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.3.9 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM Designation D 1640-95, “Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature” (see Section 3, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The lack-of-time of a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4601 (10/31/01)</td>
<td>Non-SIP Version of Rule 4601 (12/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>-----------------------------------</td>
<td>---------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td></td>
<td>quickdry enamel coating shall be determined by the Mechanical Test Method of ASTM Designation D 1640-95.</td>
<td>6.3.7 Gloss Determination: The gloss of a coating shall be determined by ASTM D523-89 (1999), “Standard Test Method for Specular Gloss” (see Section 3.0, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</td>
<td></td>
</tr>
<tr>
<td>6.3.10 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM Designation D4214-98, “Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films” (see Section 3, Specialty Primer, Sealer and Undercoater).</td>
<td>6.3.8 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, SCAQMD Laboratory Methods of Analysis for Enforcement Samples (see Section 3.0, Metallic Pigmented Coating, Aluminum Roof Coating and Faux Finish).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.3.11 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, “Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials,” SCAQMD Manual of Procedures, Volume III, adopted 11/6/96 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</td>
<td>6.3.9 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM D1613-06, “Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products” (see Section 3.0, Pre-Treatment Wash Primer).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.3.12 Exempt Compounds—Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, “Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride,” BAAQMD Manual of Procedures, Volume III, adopted 12/20/95 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</td>
<td>6.3.10 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM D1640-95, “Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature” (see Section 3.0, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quick-dry enamel coating shall be determined by the Mechanical Test Method of ASTM D1640-95. (Category deleted effective January 1, 2011.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.3.14 VOC Content of Coatings: The VOC content of a coating shall be determined by U.S. EPA Method 24 as it exists in appendix A of 40 Code of Federal Regulations (CFR) part 60, “Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings” (see Section 6.3.1).</td>
<td>6.3.12 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, “Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials,” BAAQMD Manual of Procedures, Volume III, adopted 11/6/96 (see Section 3.0, Volatile</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.3.15 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1995).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4601 (10/31/01)</td>
<td>Non-SIP Version of Rule 4601 (12/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>----------------------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4601 (10/31/01)</td>
<td>Non-SIP Version of Rule 4601 (12/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>-------------------------------------</td>
<td>----------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4601 (10/31/01)</td>
<td>Non-SIP Version of Rule 4601 (12/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>-------------------------------------</td>
<td>------------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Test Methods for Absorption and</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Bulk Specific Gravity of Dimension</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Stone&quot;; or ASTM C140-06, &quot;Standard</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Test Methods for Sampling and</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Testing Concrete Masonry Units and</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Related Units&quot;</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>6.3.26 Reactive Penetrating Sealer Water</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Vapor Transmission: Reactive</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>penetrating sealer water vapor</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>transmission shall be analyzed ASTM</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>E96/E96M-05, &quot;Standard Test Method</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>for Water Vapor Transmission of</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Materials&quot;</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>6.3.27 Reactive Penetrating Sealer -</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Chloride Screening Applications: Reactive</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>penetrating sealers shall be analyzed</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>by National Cooperative Highway Research</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Report 244 (1981), &quot;Concrete Sealers</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>for the Protection of Bridge Structures&quot;</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>6.3.28 Stone Consolidants: Stone</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>consolidants shall be tested using</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>ASTM E2167-01, &quot;Standard Guide for</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Selection and Use of Stone Consolidants&quot;</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.0 Compliance</td>
<td>Persons subject to this rule shall</td>
<td>Persons subject to this rule shall be in</td>
<td>No change in</td>
</tr>
<tr>
<td>Schedule</td>
<td>be in compliance with this rule by</td>
<td>compliance with this rule by the dates</td>
<td>the requirements, therefore, non-SIP version of rule is</td>
</tr>
<tr>
<td></td>
<td>October 31, 2001.</td>
<td>specified within the rule.</td>
<td>as stringent as SIP version.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.0 Averaging</td>
<td>8.1 On or after January 1, 2003, in</td>
<td></td>
<td>No change in</td>
</tr>
<tr>
<td>Compliance Option</td>
<td>lieu of compliance with the specified</td>
<td></td>
<td>the requirements, therefore, non-SIP version of rule is</td>
</tr>
<tr>
<td></td>
<td>limits in the Table of Standards for</td>
<td></td>
<td>as stringent as SIP version.</td>
</tr>
<tr>
<td></td>
<td>floor coatings; industrial</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>maintenance coatings; primers,</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>sealers, and undercoaters; quick-dry</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>primers, sealers, and undercoaters;</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>quick-dry enamels; roof coatings; rust</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>preventative coatings; stains;</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>waterproofing sealers, as well as</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>flats and non-flats (excluding</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>recycled coatings), manufacturers may</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>average designated coatings such that</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>their actual cumulative emissions from</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>the averaged coatings are less than or</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>equal to the cumulative emissions that</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>would have been allowed under those</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>limits over a compliance period not to</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>exceed one year. Such manufacturers</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>must also comply with the averaging</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>provisions contained in this Section,</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>as well as maintain and make available</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>for inspection records for at least</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>three years after the end of the</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>compliance period. This Section shall</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>cease to be effective on January 1,</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2005, after which averaging will no</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>longer be allowed. Per Section 8.1,</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>averaging is no longer applicable.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Therefore, Section 8.2 through 8.14</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>are not listed.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
District Rule 4601 was amended (12/17/2009). As analyzed, each amended section of the non-SIP version of the rule is at least as stringent as, or more stringent than the corresponding section of the SIP version of the rule. Therefore, it is concluded that overall the non-SIP version of the rule is more stringent than the SIP version of the rule.

The following permit requirements were added and/or revised to ensure compliance with the current rule:

a. C-14-0-2 – Facility-Wide Requirements

- Conditions 23, 24, and 25 ensure compliance with the revised requirements of this rule.

G. District Rule 4682 - Polystyrene Foam, Polyethylene, and Polypropylene Manufacturing

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of any architectural coating to no more than what is listed in the Table of Standards (Section 5.0). The following analysis shows that the proposed requirement of the current District Rule 4682 is more stringent than SIP approved version of District Rule 4682. Streamlining procedures, as documented in Appendix E is utilized to substitute the proposed set of requirements for the otherwise applicable requirements.

The following permit requirements were addressed as shown to ensure compliance with this rule:

a. N-257-2-3: 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

- The requirements of conditions 1 through 6, 20, 23 through 25, 27, 29 through 31, 41, 42, 44, 46, 47, 49 and 50 from the current PTO have been included as conditions 1 through 6, 20, 23 through 25, 27, 29 through 31, 41, 42, 44, 46, 47, 49 and 50 of the requirements for this permit unit.

H. District Rule 4801 - Sulfur Compounds

District Rule 4801 has been submitted to the EPA to replace Tulare County APCD Rule 407. This rule limits the emission of sulfur compounds to 0.2% by volumes (2000 ppmv) calculated as SO2, on a dry basis averaged over 15 minutes.

a. One (1) 14.65 MMBtu/hr Cleaver Brooks Boiler (N-257-4-3) and One (1) 26.3 MMBtu/hr Cleaver Brooks Boiler (N-257-5-3)

These units are fired on gaseous fuels and expected to comply with the requirements of this Rule as demonstrated below:

Assuming 0% excess air in the exhaust stream that corresponds with maximum SOX emissions concentration the combustion equation is (neglecting NOX and SOX relative to SO2 in the exhaust):

**Natural Gas**

\[ CH_4 + 2O_2 + 7.56N_2 + XS \rightarrow CO_2 + 2H_2O + XSO_2 + 7.56N_2 \]

**Pentane**

\[ C_5H_{12} + 16O_2 + 60.48N_2 + ZS \rightarrow 5CO_2 + 6H_2O + ZSO_2 + 60.48N_2 \]

where:

X, Y, and Z = moles of sulfur in the fuel (natural gas, propane, and pentane respectively).

Solving an expression for the fraction of SO2 in the dry exhaust by volume gives:

\[ \frac{X}{1+7.56} = 0.002 \Rightarrow X = 0.01712 \text{ for Natural Gas} \]

\[ \frac{Z}{5 + 60.48} = 0.002 \Rightarrow Z = 0.1310 \text{ for pentane} \]
where:
0.002 = 0.2% by volume limit per District Rule 4801

Use X, Y, and Z to calculate the weight fraction of S in one mole of fuel:

\[
\frac{(0.01712)(32.06)}{(16.04) + (0.01712)(32.06)} = 0.033 \Rightarrow 3.3\% \text{ S by weight in the fuel.}
\]

\[
\frac{(0.1310)(32.06)}{(72.20) + (0.1310)(32.06)} = 0.055 \Rightarrow 5.5\% \text{ S by weight in the fuel.}
\]

where:
32.06 = molecular weight of sulfur (S)
16.04 = molecular weight of CH₄
72.20 = molecular weight of C₅H₁₂

The equation shows that an exhaust concentration of sulfur is 0.2% by volume corresponds to a gaseous fuel sulfur content by weight of 3.1%-5.5%. The gaseous fuels burnt in these units are expected to contain much less than 3.1% sulfur by weight and therefore, these units are expected to comply with District Rule 4801. Condition 4 of the permit units N-257-4-5 and condition 6 of permit unit N-257-5-6 assure compliance with the requirement of Rule 4801. No additional monitoring, testing, or recordkeeping is required.

Diesel-fired units qualifying to use this template are limited to the combustion of distillate fuel with a sulfur content less than 0.5%. The following demonstration illustrates that the proposed limitation is more stringent than the county rules.

\[
\frac{\left(142 \frac{(0.5) \text{ lb SO}_2}{10^3 \text{ gal diesel}} \right) \left(23.7 \frac{\text{ L SO}_2}{\text{ gmol SO}_2} \right) \left(\frac{0.035315 \text{ dscf SO}_2}{\text{ L SO}_2} \right) \left(\frac{453.59 \text{ g SO}_2}{\text{ lb SO}_2} \right)}{\left(9190 \frac{\text{ dscf exhaust}}{\text{ MMBtu}} \right) \left(64.14 \frac{\text{ g SO}_2}{\text{ gmol SO}_2} \right) \left(\frac{137 \text{ MMBtu}}{10^5 \text{ gal diesel}} \right)} = \left(\frac{0.0003 \frac{\text{ dscf SO}_2}{\text{ dscf exhaust}}}{\frac{\text{ dscf exhaust}}{\text{ dscf exhaust}}} \right) < \left(\frac{0.002 \frac{\text{ dscf SO}_2}{\text{ dscf exhaust}}}{\frac{\text{ dscf exhaust}}{\text{ dscf exhaust}}} \right)
\]

where:
S = weight % of sulfur in the oil = 0.5 = fuel sulfur limit this template
\[
\frac{142 \text{ S lb SO}_2}{10^3 \text{ gal}} = \text{ uncontrolled emission factor for SO}_2 \text{ (AP-42, Table 1.3-2)}
\]
\[
\frac{23.7 \, \frac{L}{\text{gml}}}{1} = \frac{(288.71 \, K) \left( \frac{22.4 \, \frac{L}{\text{gml}}}{273.15 \, K} \right)}{1} = \text{molar volume of an ideal gas corrected to standard conditions (} 60^\circ \text{ F, 14.7 psi) per Charles' Law}
\]

\[0.035315 \frac{ft^3}{L} = \text{conversion factor (AP42, Appendix A)}\]

\[453.59 \frac{g}{lb} = \text{conversion factor (AP42, Appendix A)}\]

\[9,190 \frac{dscf}{MMBtu} = F\text{-factor, } F_s, \text{ for oil (40 CFR } \S 60, \text{ App. A, Meth. 19, Table 19-1)}\]

\[64.14 \frac{g \cdot \text{SO}_2}{\text{gml}} = \text{molecular weight, SO}_2\]

\[137,000 \, \text{Btu} = \text{higher heating value of distillate oil (AP-42, Appendix A)}\]

\[1 \, \text{gal diesel} = \text{parts} \cdot \text{SO}_2 = \text{County Rules 404, 406, and 407 emission limit}\]

The preceding calculation shows that, for diesel fired units, an emission concentration of 0.03\% by volume is expected; this concentration is 16.7\% of that allowed by the rule. Condition 4 of the permit unit N-257-4-5 and condition 6 of permit unit N-257-5-6 assure compliance with the requirement of Rule 4801. No additional monitoring, testing, or recordkeeping is required.

I. **District Rule 8011 - General Requirements**

The purpose of Regulation VIII (Fugitive PM10 Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM10) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The Rules contained in this Regulation have been developed pursuant to United States Environmental Protection Agency guidance for Serious PM10 Nonattainment Areas. The rules are applicable to specified anthropogenic fugitive dust sources. Fugitive dust contains PM10 and particles larger than PM10. Controlling fugitive dust missions when visible emissions are detected will not prevent all PM10 emissions, but will substantially reduce PM10 emissions.

The provisions of this rule are applicable to specified outdoor fugitive dust sources. The definitions, exemptions, requirements, administrative requirements, recordkeeping requirements, and test methods set forth in
this rule are applicable to all Rules under Regulation VIII (Fugitive PM10 Prohibitions) of the Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District.

Conditions 29 through 34 of permit unit -0-2 ensure compliance.

J. District Rule 8021 - Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities

The purpose of this rule is to limit fugitive dust emissions from construction, demolition, excavation, extraction, and other earthmoving activities.

This rule applies to any construction, demolition, excavation, extraction, and other earthmoving activities, including, but not limited to, land clearing, grubbing, scraping, travel on site, and travel on access roads to and from the site. This rule also applies to the construction of new landfill disposal sites or modification to existing landfill disposal sites prior to commencement of landfilling activities.

Section 5.0 requires that no person shall perform any construction, demolition, excavation, extraction, or other earthmoving activities unless the appropriate requirements in sections 5.1 and 5.2 are sufficiently implemented to limit VDE to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 29 of permit unit -0-2 ensures compliance.

K. District Rule 8031 - Bulk Materials

The purpose of this rule is to limit fugitive dust emissions from the outdoor handling, storage, and transport of bulk materials.

This rule applies to the outdoor handling, storage, and transport of any bulk material.

Section 5.0 requires that no person shall perform any outdoor handling, storage, and transport of bulk materials unless the appropriate requirements in Table 8031-1 of this rule are sufficiently implemented to limit VDE to 20% opacity or to comply with the conditions for a stabilized surface as defined in Rule 8011. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 30 of permit unit -0-2 ensures compliance.
L. District Rule 8041 - Carryout and Trackout

The purpose of this rule is to limit fugitive dust emissions from carryout and trackout.

This rule applies to all sites that are subject to Rules 8021 (Construction, Demolition, Excavation, Extraction, and other Earthmoving Activities), 8031 (Bulk Materials), and 8071 (Unpaved Vehicle and Equipment Traffic Areas) where carryout or trackout has occurred or may occur.

Section 5.0 requires that an owner/operator shall sufficiently prevent or cleanup carryout and trackout as specified in sections 5.1 through 5.8. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII. The use of blower devices, or dry rotary brushes or brooms, for removal of carryout and trackout on public roads is expressly prohibited. The removal of carryout and trackout from paved public roads does not exempt an owner/operator from obtaining state or local agency permits which may be required for the cleanup of mud and dirt on paved public roads.

Condition 31 of permit unit -0-2 ensures compliance.

M. District Rule 8051 - Open Areas

The purpose of this rule is to limit fugitive dust emissions from open areas.

This rule applies to any open area having 3.0 acres or more of disturbed surface area, that has remained undeveloped, unoccupied, unused, or vacant for more than seven days.

Section 5.0 requires that whenever open areas are disturbed or vehicles are used in open areas, the owner/operator shall implement one or a combination of control measures indicated in Table 8051-1 to comply with the conditions of a stabilized surface at all times and to limit VDE to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 32 of permit unit -0-2 ensures compliance.

N. District Rule 8061 - Paved and Unpaved Roads

The purpose of this rule is to limit fugitive dust emissions from paved and unpaved roads by implementing control measures and design criteria.
This rule applies to any new or existing public or private paved or unpaved road, road construction project, or road modification project.

Condition 33 of permit unit -0-2 ensures compliance.

O. District Rule 8071 - Unpaved Vehicle/Equipment Traffic Area

The purpose of this rule is to limit fugitive dust emissions from unpaved vehicle and equipment traffic areas by implementing control measures and design criteria.

This rule applies to any unpaved vehicle/equipment traffic area of 1.0 acre or larger.

Condition 34 of permit unit -0-2 ensures compliance.

P. 40 CFR Part 64 - Compliance Assurance Monitoring (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), baghouse, and catalytic oxidizer; and
3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

a. N-257-2-3: 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.

- This permit unit is equipped with continuous emissions monitoring system (CEMS) for criteria air pollutants. Therefore, this permit unit is exempt from the CAM requirements.

b. N-257-4-5: 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

This permit unit has emissions limits for \( \text{SO}_x \), \( \text{PM}_{10} \), \( \text{CO} \), and \( \text{VOC} \) but it does not have add-on controls for these criteria pollutants. Therefore, this permit unit is not subject to CAM for \( \text{SO}_x \), \( \text{PM}_{10} \), \( \text{CO} \), and \( \text{VOC} \).

This permit may be subject to CAM for \( \text{NO}_x \), as there is a \( \text{NO}_x \) limit, and has add-on controls in the form of Flue Gas Recirculation (FGR). However, as shown below, the pre-control potential to emit is not greater than the major source threshold of 20,000 pounds \( \text{NO}_x \)/year. Therefore, this permit unit is not subject to CAM

The uncontrolled natural gas emission factor for \( \text{NO}_x \) is 50 lb/MMscf or 0.049 lb/MMBtu. Since the unit is equipped with a ultra low \( \text{NO}_x \) burner, the uncontrolled emission factor was taken from AP-42, Table 1.4-5 for a small boiler less than 100 MMBtu/hr equipped with a low \( \text{NO}_x \) burner (July 1998) to be conservative. The maximum rating for this unit is 14.65 MMBtu/hr.

\[
\text{PE} = 14.65 \text{ MMBtu/hr} \times 0.049 \text{ lb NO}_x/\text{MMBtu} \times 8,760 \text{ hrs/year} = 6,288 \text{ lbs NO}_x/\text{year}
\]

c. N-257-5-6: 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

This permit unit has emissions limits for \( \text{SO}_x \), \( \text{PM}_{10} \), \( \text{CO} \), and \( \text{VOC} \) but it does not have add-on controls for these criteria pollutants. Therefore, this permit unit is not subject to CAM for \( \text{SO}_x \), \( \text{PM}_{10} \), \( \text{CO} \), and \( \text{VOC} \).
This permit may be subject to CAM for NO\textsubscript{X}, as there is a NO\textsubscript{X} limit, and has add-on controls in the form of Flue Gas Recirculation (FGR). However, as shown below, the pre-control potential to emit is not greater than the major source threshold of 20,000 pounds NO\textsubscript{X}/year. Therefore, this permit unit is not subject to CAM.

The uncontrolled natural gas emission factor for NO\textsubscript{X} is 50 lb/MMscf or 0.049 lb/MMBtu. Since the unit is equipped with a ultra low NO\textsubscript{X} burner, the uncontrolled emission factor was taken from AP-42, Table 1.4-5 for a small boiler less than 100 MMBtu/hr equipped with a low NO\textsubscript{X} burner (July 1998) to be conservative. The maximum rating for this unit is 29.3 MMBtu/hr.

\[
\text{PE} = 29.3 \text{ MMBtu/hr} \times 0.049 \text{ lb NO}_X/\text{MMBtu} \times 8,760 \text{ hrs/year} \\
= 12,577 \text{ lbs NO}_X/\text{year}
\]

d. N-257-6-3: 121,680 SQ FT FINAL STYROFOAM PRODUCT STORAGE WAREHOUSE

- This unit is not subject to CAM since it does not have any add-on control device for this unit.


These regulations apply to demolition or renovation activity, as defined in 40 CFR 61.141. 40 CFR Section 61.150 of this Subpart was amended September 18, 2003.

Condition 35 on the proposed modified permit to operate (C-36-0-2) ensures compliance with this requirement.

**R. 40 CFR Part 82, Subparts B and F – Stratospheric Ozone**

These regulations apply to servicing motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC). Sections of this regulation were amended in 2007 and 2008.

Conditions 27 and 28 on the proposed modified permit to operate (C-36-0-2) ensure compliance with these requirements.
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.

The applicant has requested a permit shield for all applicable federally enforceable requirements and non-federally-enforceable requirements, as well as requirements listed in the permit application but not included in the Title V permit because they do not apply to this facility.

A. Requirements Addressed by Model General Permit Templates

The applicant does not propose to use any model general permit templates.

B. Federally Enforceable Requirements

The permit shields for federally enforceable requirements are included as conditions 39 and 40 under permit unit C-257-0-2.

C. Obsolete Permit Shields

There are no obsolete permit shield conditions to be removed from the permits.

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
D. Rule 4601-Architectural Coatings VOC Limit Tables
E. Rule 4682- Polystyrene Foam, Polyethylene, and Polypropylene Manufacturing
ATTACHMENT A

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

FACILITY: N-257-0-2

FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit

2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit

3. {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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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 8011] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
34. (4395) Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District 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. (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

40. (4401) Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin November 30 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

43. Facility-wide daily NOx emissions shall not exceed 150 pounds in any one day. Facility-wide daily NOx 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 NOx Emissions = [(0.011 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0512 x Daily Fuel Oil Combusted (MMBtu per day))] + [(0.008 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0512 x Daily Fuel Oil Combusted (MMBtu per day))]. [District NSR Rule] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
44. Facility-wide daily VOC emissions shall not exceed 250 pounds in any one day. Facility-wide daily VOC emissions from the 14.65 MMBtu/hr Boiler (N-257-4) and the 29.3 MMBtu/hr Boiler (N-257-5) shall be calculated as follows:

\[
\text{Daily VOC Emissions} = [(0.0042 \times \text{Daily Natural Gas Fuel Combusted (MMBtu per day)}) + (0.0045 \times \text{Daily Fuel Oil Combusted (MMBtu per day)})] + [(0.0042 \times \text{Daily Natural Gas Fuel Combusted (MMBtu per day)}) + (0.0045 \times \text{Daily Fuel Oil Combusted (MMBtu per day)})].
\]

[District NSR Rule] Federally Enforceable Through Title V Permit

45. The permittee shall maintain daily records of the calculated daily facility-wide NOx and VOC emissions. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

46. Records of the daily facility-wide NOx and VOC emissions shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-257-2-3

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

PERMIT UNIT REQUIREMENTS

1. The permanent total enclosure (PTE) around the raw bead dumping operation serving Rodman pre-expanders shall follow PTE criteria in EPA Method 204, and shall be vented to the vapor recovery system at or above the average facial velocity of 200 feet per minute. [District Rule 4682] Federally Enforceable Through Title V Permit

2. The cascade dryers serving Rodman pre-expanders shall be completely sealed and vented to the vapor recovery system when Rodman pre-expander operates. [District Rule 4682] Federally Enforceable Through Title V Permit

3. The permittee shall operate and maintain two Hirsch pre-expanders. [District Rule 4682] Federally Enforceable Through Title V Permit

4. Two bladder bags, one for each Hirsch pre-expander, shall be used to collect pentane from each pre-expander vent. The collected vapors shall be released into the vapor recovery system. [District Rule 4682]

5. Delumpers (i.e. bottom part to which pre-puff is discharged) of Hirsch pre-expanders shall be completely sealed and vented to the vapor recovery system. [District Rule 4682] Federally Enforceable Through Title V Permit

6. The permittee shall operate and maintain a separate raw bead handling system for Hirsch pre-expanders. This bead handling system includes: a bead dumping operation transferring raw beads into a hopper, enclosed augers transferring beads from the hopper to a holding tank and from the holding tank to the feeders and weigh bins for Hirsch pre-expanders. The bead dumping operation shall be conducted inside a PTE that must meet PTE criteria in EPA Method 204. The bead transferring augers, product holding tanks, new feeders and weigh bins shall be enclosed and designed to meet PTE criteria in EPA Method 204. Each unit in the bead handling system shall be vented to the vapor recovery system. The average facial velocity shall be at or above 200 feet per minute for Hirsch bead dump PTE, each Hirsch holding tank, and each weigh bin PTE. [District Rule 4682] Federally Enforceable Through Title V Permit

7. The vapor recovery system shall be connected to the boilers (N-257-4 and N-257-5) at all times, except for periods of routine testing or emergency safety. [District Rule 2201] Federally Enforceable Through Title V Permit

8. The vapor recovery system shall be operated in a manner which maximizes collection efficiency at all times. [District Rule 2201] Federally Enforceable Through Title V Permit

9. The polystyrene pellets shall be received and stored in cartons and/or bags lined with vapor transmission inhibiting film. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: DART CONTAINER CORPORATION
Location: 1400 EAST VICTOR ROAD, LODI, CA 95240
N-257-3-3: Mar 9 2011 7:17AM - M666MR
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 is same as defined in Section 5.3.1 of Rule 4682 (9/20/2007). [District Rule 4682] Federally Enforceable Through Title V Permit

21. 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

22. 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

23. 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

24. 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

25. 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

26. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
27. 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

28. 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

29. 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

30. 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

31. 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: \( [(P1 - P3) - (P1 - P2)(CE)] \times \text{(Processing Rate (lb-EPS/day))} \). [District Rule 2201] Federally Enforceable Through Title V Permit

32. 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

33. 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

34. The overall pentane emissions reductions from the bead handling systems (%) shall be computed using the following equation: \( (100) - \frac{M_i - M_o}{M_i} \times \frac{M_o}{M_i} \), where \( M_i \) = mass emission rate at the inlet of boilers (lb-VOC/day), \( M_o \) = mass emission rate at boilers stack (lb-VOC/day), \( E_1 \) = (Processing Rate)(P1 - P2) lb-VOC/day for the material processed through the Rodman pre-expander, \( E_2 \) = (Processing Rate)(P1 - P2) lb-VOC/day for the material processed through the Hirsch pre-expander. [District Rule 1081 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

35. 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

36. 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

37. 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

38. Temperature of the Rodman pre-expander 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

Facility Name: DART CONTAINER CORPORATION
Location: 1400 EAST VICTOR ROAD, LODI, CA 95240

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
39. 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

40. 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

41. 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

42. The permittee shall maintain records of the daily Manufacturing VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

43. 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

44. 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

45. 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

46. 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

47. 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

48. The laden airstream 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

49. 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

50. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64 for the boilers. [40 CFR Part 64] Federally Enforceable Through Title V Permit

51. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
52. 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
PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

2. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, 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 hvy 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 NOx @ 3% O2 or 0.011 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 50 ppmv CO @ 3% O2 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
12. Emissions rates when this unit is firing on fuel oil #2 shall not exceed any of the following limits: 40.0 ppmv NOx @ 3% O2 or 0.0512 lb-NOx/MMBtu, 0.0016 lb-SOx/MMBtu, 0.015 lb-PM10/MMBtu, 100 ppmv CO @ 3% O2 or 0.078 lb-CO/MMBtu, or 0.0045 lb-VOC/MMBtu. [District NSR Rule and Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

13. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

14. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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

17. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

19. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

22. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

23. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
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 NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (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-257-5-6

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

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2 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 NOX emissions, while firing on natural gas, shall not exceed 7 ppmvd @ 3% O2 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% O2 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 SOx emissions, while firing on natural gas, shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

11. The PM10 emissions, while firing on natural gas, shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

12. The NOX emissions, while firing on #2 fuel oil, shall not exceed 40 ppmvd @ 3% O2 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% O2 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.

Facility Name: DART CONTAINER CORPORATION
Location: 1400 EAST VICTOR ROAD, LODI, CA 95240
N-257-5-6: Mar 7 2011 3:18PM - HARRBR
15. The SOx 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 PM10 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 NOx, CO, and O2 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 NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of 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 NOx, CO, and O2 measurements, (2) the O2 concentration in percent by volume and the measured NOx and CO concentrations corrected to 3% O2, (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 NOx and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of 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
26. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

27. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

28. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit

29. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

30. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

31. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

32. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

33. The fuel oil sulfur content shall be determined utilizing ASTM method D-6920-03, ASTM method D-5453-99 or a District approved equivalent. [District Rule 4320] Federally Enforceable Through Title V Permit

34. (4356) Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]

35. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit

36. An annual record of the cumulative number of hours of operation on #2 fuel oil and of the reason for this operation shall be kept. The record shall be updated at least monthly. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

37. A record of the monthly quantity of each fuel burned shall be kept. [40 CFR Part 60.42c(g)] Federally Enforceable Through Title V Permit

38. 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

39. This unit is subject to the requirements of 40 CFR Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Dc] Federally Enforceable Through Title V Permit

40. The permittee shall comply with the reporting and record keeping requirements of 40 CFR Part 60.48c. [40 CFR Part 60, Subpart Dc] Federally Enforceable Through Title V Permit
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-257-6-3

EXPIRATION DATE: 04/30/2009

EQUIPMENT DESCRIPTION:
121,680 SQ FT FINAL STYROFOAM PRODUCT STORAGE WAREHOUSE

PERMIT UNIT REQUIREMENTS

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

Previous Title V Operating Permit
FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit

2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit

3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit

4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (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] 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 EAST VICTOR ROAD, LODI, CA 95240

N-257-0-1 Fac 28 2011 11:35AM - HARRIS
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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in 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 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 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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). 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 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01) and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

41. On November 30, 2004, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report 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

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

43. The total NOx emissions from the entire stationary source shall not exceed 150 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit

44. The total VOC emissions from the entire stationary source excluding the warehouse emissions shall not exceed 250 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
PERMIT UNIT: N-257-2-4

EXPIRATION DATE: 04/30/2009

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

PERMIT UNIT REQUIREMENTS

1. The permanent total enclosure (PTE) around the raw bead dumping operation serving Rodman pre-expanders shall follow PTE criteria in EPA Method 204, and shall be vented to the vapor recovery system at or above the average facial velocity of 200 feet per minute. [District Rule 4682] Federally Enforceable Through Title V Permit

2. The cascade dryers serving Rodman pre-expanders shall be completely sealed and vented to the vapor recovery system when Rodman pre-expander operates. [District Rule 4682] Federally Enforceable Through Title V Permit

3. The permittee shall operate and maintain two Hirsch pre-expanders. [District Rule 4682] Federally Enforceable Through Title V Permit

4. Two bladder bags, one for each Hirsch pre-expander, shall be used to collect pentane from each pre-expander vent. The collected vapors shall be released into the vapor recovery system. [District Rule 4682]

5. Delumpers (i.e. bottom part to which pre-puff is discharged) of Hirsch pre-expanders shall be completely sealed and vented to the vapor recovery system. [District Rule 4682] Federally Enforceable Through Title V Permit

6. The permittee shall operate and maintain a separate raw bead handling system for Hirsch pre-expanders. This bead handling system includes: a bead dumping operation transferring raw beads into a hopper, enclosed augers transferring beads from the hopper to a holding tank and from the holding tank to the feeders and weigh bins for Hirsch pre-expanders. The bead dumping operation shall be conducted inside a PTE that must meet PTE criteria in EPA Method 204. The bead transferring augers, product holding tanks, new feeders and weigh bins shall be enclosed and designed to meet PTE criteria in EPA Method 204. Each unit in the bead handling system shall be vented to the vapor recovery system. The average facial velocity shall be at or above 200 feet per minute for Hirsch bead dump PTE, each Hirsch holding tank, and each weigh bin PTE. [District Rule 4682] Federally Enforceable Through Title V Permit

7. The vapor recovery system shall be connected to the boilers (N-257-4 and N-257-5) at all times, except for periods of routine testing or emergency safety. [District Rule 2201] Federally Enforceable Through Title V Permit

8. The vapor recovery system shall be operated in a manner which maximizes collection efficiency at all times. [District Rule 2201] Federally Enforceable Through Title V Permit

9. The polystyrene pellets shall be received and stored in cartons and/or bags lined with vapor transmission inhibiting film. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
10. The operator shall visibly inspect the polystyrene pellet cartons upon receipt and weekly thereafter for damage to the vapor transmission inhibiting film. If damage is discovered, the permittee shall take corrective action immediately by either processing the carton or re-sealing the carton. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

11. All conveyors shall be enclosed to minimize fugitive VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

12. The chamber temperature of each Rodman pre-expander shall not exceed 215°F. [District Rule 2201] Federally Enforceable Through Title V Permit

13. The pre-puff beads shall be processed in a manner that minimizes fugitive VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

14. There shall be no visible emissions from the bead handling systems, pre-expansion systems, or the molding systems. [District Rule 2201] Federally Enforceable Through Title V Permit

15. The pentane content in the raw EPS beads shall be at or below 5.4% by weight, when the raw bead boxes are received from a vendor. EPS bead manufacturer certification receipt must be kept as a record to demonstrate compliance with this condition. [District Rule 2201] Federally Enforceable Through Title V Permit

16. Manufacturing emissions are defined as the emissions from bead handling, pre-puffing, and molding processes. [District Rule 2201] Federally Enforceable Through Title V Permit

17. The Manufacturing VOC emissions shall not exceed 161.1 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

18. The amount of raw EPS beads processed through the Rodman and Hirsch pre-expanders shall not exceed 28,774 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

19. The amount of raw EPS beads through any one Hirsch pre-expander shall not exceed 19,423 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

20. The total product emissions shall not exceed 2.4 pounds of VOC per 100 pounds of the raw beads processed, calculated over a monthly period. Exceeding this limit shall constitute violation for each day of that monthly period. The total product emissions is same as defined in Section 5.3.1 of Rule 4682 (9/20/2007). [District Rule 4682] Federally Enforceable Through Title V Permit

21. 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

22. 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

23. 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

24. 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

25. 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

26. 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
27. 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

28. 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

29. 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

30. 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

31. 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: \[ [(P1 - P3) - (P1 - P2)(CE)](Processing Rate (lb-EPS/day)). \] [District Rule 2201] Federally Enforceable Through Title V Permit

32. For processing a single type of EPS material in a given day, the daily Manufacturing VOC emissions shall be determined using the following equation: \[ [(P1 - P3)(Processing Rate (lb/day)) - (CEMS data, lb-VOC/day)(CE)]. \] [District Rule 2201] Federally Enforceable Through Title V Permit

33. 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

34. The overall pentane emissions reductions from the bead handling systems (%) shall be computed using the following equation: \[ (\text{100})\left(\frac{(M_i - M_o)}{M_i} \right) \left(\frac{M_i}{(E_1+E_2)}\right), \] where \( M_i = \text{mass emission rate at the inlet of boilers (lb-VOC/day),} \) \( M_o = \text{mass emission rate at boilers stack (lb-VOC/day),} \) \( E_1 = \text{Processing Rate (P1 - P2)} \) lb-VOC/day for the material processed through the Rodman pre-expanders, \( E_2 = \text{Processing Rate (P1 - P2)} \) 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

35. 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

36. 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

37. 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

38. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

40. 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

41. 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

42. The permittee shall maintain records of the daily Manufacturing VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

43. The permittee shall maintain records of the total product emissions (lb-VOC/100 lb of raw beads processed), calculated over a monthly period. [District Rule 4682] Federally Enforceable Through Title V Permit

44. 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

45. 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

46. 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

47. 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

48. The laden airstream 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

49. 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

50. 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

51. 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
52. 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.
PERMIT UNIT: N-257-4-6

EXPIRATION DATE: 04/30/2009

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 SYSTEM.

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

2. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, 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 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 lvh 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 Rule 2520, 9.3.2; 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 NOx @ 3% O2 or 0.011 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 50 ppmv CO @ 3% O2 or 0.039 lb-CO/MMBtu, or 0.0042 lb-VOC/MMBtu. [District NSR Rule and Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.
12. Emissions rates when this unit is firing on fuel oil #2 shall not exceed any of the following limits: 40.0 ppmv NOx @ 3% O2 or 0.0512 lb-NOx/MMBtu, 0.0016 lb-SOx/MMBtu, 0.015 lb-PM10/MMBtu, 100 ppmv CO @ 3% O2 or 0.078 lb-CO/MMBtu, or 0.0045 lb-VOC/MMBtu. [District NSR Rule and Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

13. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

14. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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

17. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

19. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

22. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e., the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

23. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
24. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

25. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (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]

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]

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-257-5-7  
EXPIRATION DATE: 04/30/2009

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

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. 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
3. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2 nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
4. 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
5. 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
6. The boiler shall be fired only on natural gas or fuel oil #2. [District Rule 2201] Federally Enforceable Through Title V Permit
7. 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
8. 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
9. The NOx emissions, while firing on natural gas, shall not exceed 7 ppmvd @ 3% O2 or 0.008 lb/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
10. The CO emissions, while firing on natural gas shall not exceed 50 ppmvd @ 3% O2 or 0.037 lb/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
11. The VOC emissions, while firing on natural gas, shall not exceed 0.0042 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The SOx emissions, while firing on natural gas, shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The PM10 emissions, while firing on natural gas, shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The NOx emissions, while firing on #2 fuel oil, shall not exceed 40 ppmvd @ 3% O2 or 0.052 lb/MMBtu. [District Rules 2201 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.
15. The CO emissions, while firing on #2 fuel oil, shall not exceed 50 ppmvd @ 3% O2 or 0.039 lb/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit

16. 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

17. The SOx emissions, while firing on #2 fuel oil, shall not exceed 0.0016 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

18. The PM10 emissions, while firing on #2 fuel oil, shall not exceed 0.015 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

19. 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

20. The permittee shall monitor and record the stack concentration of NOX, CO, and O2 at least once every month (in which a source test is not performed) using a portable 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

21. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

22. 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

23. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent by volume and the measured NOx and CO concentrations corrected to 3% O2, (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

24. 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

25. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of 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

26. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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


27. 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

28. 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

29. 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

30. 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

31. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

32. 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

33. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

34. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

35. 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

36. 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]

37. 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

38. 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

39. A record of the monthly quantity of each fuel burned shall be kept. [40 CFR Part 60.42c(g)] Federally Enforceable Through Title V Permit

40. 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

41. This unit is subject to the requirements of 40 CFR Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Dc] Federally Enforceable Through Title V Permit

42. The permittee shall comply with the reporting and record keeping requirements of 40 CFR Part 60.48c. [40 CFR Part 60, Subpart Dc] 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-257-6-1
EXPIRATION DATE: 04/30/2009

EQUIPMENT DESCRIPTION:
121,680 SQ FT FINAL STYROFOAM PRODUCT STORAGE WAREHOUSE

PERMIT UNIT REQUIREMENTS

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

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

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

Detailed Facility List
### Detailed Facility Report

**For Facility=257 and excluding Deleted Permits**

**Sorted by Facility Name and Permit Number**

<table>
<thead>
<tr>
<th>PERMIT NUMBER</th>
<th>FEE DESCRIPTION</th>
<th>FEE RULE</th>
<th>QTY</th>
<th>AMOUNT</th>
<th>TOTAL</th>
<th>STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-257-2-4</td>
<td>541 hp</td>
<td>3020-01 F</td>
<td>1</td>
<td>607.00</td>
<td>607.00</td>
<td>A</td>
</tr>
<tr>
<td>N-257-4-6</td>
<td>14.65 MMBtu/hr</td>
<td>3020-02 G</td>
<td>1</td>
<td>815.00</td>
<td>815.00</td>
<td>A</td>
</tr>
<tr>
<td>N-257-5-7</td>
<td>29.3 MMBtu/hr</td>
<td>3020-02 H</td>
<td>1</td>
<td>1,030.00</td>
<td>1,030.00</td>
<td>A</td>
</tr>
<tr>
<td>N-257-6-1</td>
<td>miscellaneous</td>
<td>3020-06</td>
<td>1</td>
<td>105.00</td>
<td>105.00</td>
<td>A</td>
</tr>
</tbody>
</table>

**Equipment Description:**
- **N-257-2-4**: 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 FEEDWEIGHT BINS, TWO HIRSCH PRE-EXPANDERS WITH VENTS AND DELLUMPS, AND TWO BLADDER TANKS ALL VENTED TO THE VAPOR RECOVERY SYSTEM; AND EIGHTY-SEVEN MOLDING MACHINES. THE VAPOR RECOVERY SYSTEM WITH AN IN-LINE CYCLONE SEPARATOR IS VENTED TO THE BOILERS PERMITTED UNDER N-257-4 AND N-257-5.
- **N-257-4-6**: 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 SYSTEM.
- **N-257-5-7**: 29.3 MMBTU/HR CLEAVER BROOKS BOILER MODEL CB 400-700-150 WITH A CLEAVER BROOKS MODEL #CB-NTI ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION.
- **N-257-6-1**: 121,680 SQ FT FINAL STYROFOAM PRODUCT STORAGE WAREHOUSE

**Number of Facilities Reported:** 1
TABLE OF STANDARDS

Limits are expressed in grams of VOC per liter of coating thinned to the manufacturer's maximum recommendation, excluding the volume of any water, exempt compounds, or colorant added to tint bases. Manufacturer's maximum recommendation means the maximum recommendation for thinning that is indicated on the label or lid of the coating container.

<table>
<thead>
<tr>
<th>COATING CATEGORY</th>
<th>EFFECTIVE DATES</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>10/31/01</td>
</tr>
<tr>
<td>Flat Coatings</td>
<td>250</td>
</tr>
<tr>
<td>Nonflat Coatings</td>
<td>250</td>
</tr>
<tr>
<td>Nonflat - High Gloss Coatings</td>
<td>250</td>
</tr>
<tr>
<td>Specialty Coatings</td>
<td></td>
</tr>
<tr>
<td>Antenna Coatings</td>
<td>530</td>
</tr>
<tr>
<td>Antifouling Coatings</td>
<td>400</td>
</tr>
<tr>
<td>Bituminous Roof Coatings</td>
<td>300</td>
</tr>
<tr>
<td>Bituminous Roof Primers</td>
<td>350</td>
</tr>
<tr>
<td>Bond Breakers</td>
<td>350</td>
</tr>
<tr>
<td>Clear Wood Coatings:</td>
<td></td>
</tr>
<tr>
<td>Clear Brushing Lacquers</td>
<td>680</td>
</tr>
<tr>
<td>Lacquers (including lacquer sanding sealers)</td>
<td>680</td>
</tr>
<tr>
<td>Sanding Sealers (other than lacquer sanding sealers)</td>
<td>350</td>
</tr>
<tr>
<td>Varnishes</td>
<td>350</td>
</tr>
<tr>
<td>Concrete Curing Compounds</td>
<td>350</td>
</tr>
<tr>
<td>Dry Fog Coatings</td>
<td>400</td>
</tr>
<tr>
<td>Faux Finishing Coatings</td>
<td>350</td>
</tr>
<tr>
<td>Fire Resistant Coatings</td>
<td>350</td>
</tr>
<tr>
<td>Fire-Resistant Coatings</td>
<td></td>
</tr>
<tr>
<td>Clear</td>
<td>650</td>
</tr>
<tr>
<td>Opaque</td>
<td>350</td>
</tr>
<tr>
<td>Floor Coatings</td>
<td>259</td>
</tr>
<tr>
<td>Flow Coatings</td>
<td>420</td>
</tr>
<tr>
<td>Form-Release Compounds</td>
<td>250</td>
</tr>
<tr>
<td>Graphic Arts Coatings (Sign Paints)</td>
<td>500</td>
</tr>
<tr>
<td>High Temperature Coatings</td>
<td>420</td>
</tr>
<tr>
<td>Industrial Maintenance Coatings</td>
<td>340</td>
</tr>
<tr>
<td>Low Solids Coatings</td>
<td>120^b</td>
</tr>
<tr>
<td>Magnesite Cement Coatings</td>
<td>450</td>
</tr>
<tr>
<td>Mastic Texture Coatings</td>
<td>300</td>
</tr>
<tr>
<td>Metallic Pigmented Coatings</td>
<td>500</td>
</tr>
<tr>
<td>Multi-Color Coatings</td>
<td>420</td>
</tr>
<tr>
<td>Pre-Treatment Wash Primers</td>
<td>420</td>
</tr>
<tr>
<td>Primers, Sealers, and Undercoaters</td>
<td>350</td>
</tr>
<tr>
<td>Quick-Dry Enamels</td>
<td>400</td>
</tr>
<tr>
<td>Quick-Dry Primers, Sealers and Undercoaters</td>
<td>450</td>
</tr>
<tr>
<td>Recycled Coatings</td>
<td>250</td>
</tr>
</tbody>
</table>

TABLE OF STANDARDS, continued
<table>
<thead>
<tr>
<th>Roof Coatings</th>
<th>10/31/01</th>
<th>1/1/2003</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rust Preventative Coatings</td>
<td>250</td>
<td>250</td>
</tr>
<tr>
<td>Shellacs:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clear</td>
<td>730</td>
<td>730</td>
</tr>
<tr>
<td>Opaque</td>
<td>550</td>
<td>550</td>
</tr>
<tr>
<td>Specially Primers, Sealers, and Undercoaters</td>
<td>350</td>
<td>350</td>
</tr>
<tr>
<td>Stains</td>
<td>350</td>
<td>250</td>
</tr>
<tr>
<td>Swimming Pool Coatings</td>
<td>340</td>
<td>340</td>
</tr>
<tr>
<td>Swimming Pool Repair and Maintenance Coatings</td>
<td>340</td>
<td>340</td>
</tr>
<tr>
<td>Temperature-Indicator Safety Coatings</td>
<td>550</td>
<td>550</td>
</tr>
<tr>
<td>Traffic Marking Coatings</td>
<td>150</td>
<td>150</td>
</tr>
<tr>
<td>Waterproofing Sealers</td>
<td>400</td>
<td>250</td>
</tr>
<tr>
<td>Waterproofing Concrete/Masonry Sealers</td>
<td>400</td>
<td>400</td>
</tr>
<tr>
<td>Wood Preservatives</td>
<td>350</td>
<td>350</td>
</tr>
</tbody>
</table>

a Conversion factor: one pound VOC per gallon (U.S.) = 119.95 grams VOC per liter.
b Units are grams of VOC per liter of coating, including water and exempt compounds in accordance with Section 3.27.

6.0 Administrative Requirements

6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections 6.1.1 through 6.1.9 on the coating container (or label) in which the coating is sold or distributed.

6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.

6.1.2 Thinning Recommendations: A statement of the manufacturer’s recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.

6.1.3 VOC Content: Each container of any coating subject to this rule shall display either the maximum or actual VOC content of the coating, as supplied, including the maximum thinning as recommended by the manufacturer. VOC content shall be displayed in grams of VOC per liter of coating. VOC content displayed shall be calculated using product formulation data, or shall be determined using the test methods in Section 6.3.1. The equations in Sections 3.25 or 3.26, as appropriate, shall be used to calculate VOC content.
TABLE OF STANDARDS 1 (Effective through 12/31/10)
Limits are expressed in grams of VOC per liter of coating thinned to the manufacturer's maximum recommendation, excluding the volume of any water, exempt compounds, or colorant added to tint bases. Manufacturer's maximum recommendation means the maximum recommendation for thinning that is indicated on the label or lid of the coating container.

<table>
<thead>
<tr>
<th>COATING CATEGORY</th>
<th>Effective Date: 1/1/2003</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flat Coatings</td>
<td>100</td>
</tr>
<tr>
<td>Nonflat Coatings</td>
<td>150</td>
</tr>
<tr>
<td>Nonflat - High Gloss Coatings</td>
<td>250</td>
</tr>
<tr>
<td>Specialty Coatings</td>
<td></td>
</tr>
<tr>
<td>Antenna Coatings</td>
<td>530</td>
</tr>
<tr>
<td>Antifouling Coatings</td>
<td>400</td>
</tr>
<tr>
<td>Bituminous Roof Coatings</td>
<td>300</td>
</tr>
<tr>
<td>Bituminous Roof Primers</td>
<td>350</td>
</tr>
<tr>
<td>Bond Breakers</td>
<td>350</td>
</tr>
<tr>
<td>Clear Wood Coatings:</td>
<td></td>
</tr>
<tr>
<td>Clear Brushing Lacquers</td>
<td>680</td>
</tr>
<tr>
<td>Lacquers (including lacquer sanding sealers)</td>
<td>550</td>
</tr>
<tr>
<td>Sanding Sealers (other than lacquer sanding sealers)</td>
<td>350</td>
</tr>
<tr>
<td>Varnishes</td>
<td>350</td>
</tr>
<tr>
<td>Concrete Curing Compounds</td>
<td>350</td>
</tr>
<tr>
<td>Dry Fog Coatings</td>
<td>400</td>
</tr>
<tr>
<td>Faux Finishing Coatings</td>
<td>350</td>
</tr>
<tr>
<td>Fire Resistive Coatings</td>
<td>350</td>
</tr>
<tr>
<td>Fire-Retardant Coatings:</td>
<td></td>
</tr>
<tr>
<td>Clear</td>
<td>650</td>
</tr>
<tr>
<td>Opaque</td>
<td>350</td>
</tr>
<tr>
<td>Floor Coatings</td>
<td>250</td>
</tr>
<tr>
<td>Flow Coatings</td>
<td>420</td>
</tr>
<tr>
<td>Form-Release Compounds</td>
<td>250</td>
</tr>
<tr>
<td>Graphic Arts Coatings (Sign Paints)</td>
<td>500</td>
</tr>
<tr>
<td>High Temperature Coatings</td>
<td>420</td>
</tr>
<tr>
<td>Industrial Maintenance Coatings</td>
<td>250</td>
</tr>
<tr>
<td>Low Solids Coatings</td>
<td>120&lt;sup&gt;b&lt;/sup&gt;</td>
</tr>
<tr>
<td>Magnesite Cement Coatings</td>
<td>450</td>
</tr>
<tr>
<td>Mastic Texture Coatings</td>
<td>300</td>
</tr>
<tr>
<td>Metallic Pigmented Coatings</td>
<td>500</td>
</tr>
<tr>
<td>Multi-Color Coatings</td>
<td>250</td>
</tr>
<tr>
<td>COATING CATEGORY</td>
<td>Effective Date.</td>
</tr>
<tr>
<td>------------------------------------------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Pre-Treatment Wash Primers</td>
<td>420</td>
</tr>
<tr>
<td>Primers, Sealers, and Undercoaters</td>
<td>200</td>
</tr>
<tr>
<td>Quick-Dry Enamels</td>
<td>250</td>
</tr>
<tr>
<td>Quick-Dry Primers, Sealers and Undercoaters</td>
<td>200</td>
</tr>
<tr>
<td>Recycled Coatings</td>
<td>250</td>
</tr>
<tr>
<td>Roof Coatings</td>
<td>250</td>
</tr>
<tr>
<td>Rust Preventative Coatings</td>
<td>400</td>
</tr>
<tr>
<td>Shellacs:</td>
<td></td>
</tr>
<tr>
<td>Clear</td>
<td>730</td>
</tr>
<tr>
<td>Opaque</td>
<td>550</td>
</tr>
<tr>
<td>Specialty Primers, Sealers, and Undercoaters</td>
<td>350</td>
</tr>
<tr>
<td>Stains</td>
<td>250</td>
</tr>
<tr>
<td>Swimming Pool Coatings</td>
<td>340</td>
</tr>
<tr>
<td>Swimming Pool Repair and Maintenance Coatings</td>
<td>340</td>
</tr>
<tr>
<td>Temperature-Indicator Safety Coatings</td>
<td>550</td>
</tr>
<tr>
<td>Traffic Marking Coatings</td>
<td>150</td>
</tr>
<tr>
<td>Waterproofing Sealers</td>
<td>250</td>
</tr>
<tr>
<td>Waterproofing Concrete/Masonry Sealers</td>
<td>400</td>
</tr>
<tr>
<td>Wood Preservatives</td>
<td>350</td>
</tr>
</tbody>
</table>

a Conversion factor: one pound VOC per gallon (U.S.) = 119.95 grams VOC per liter.
b Units are grams of VOC per liter of coating, including water and exempt compounds in accordance with Section 3.27.
<table>
<thead>
<tr>
<th>COATING CATEGORY</th>
<th>VOC Limit (g/l) Effective 1/1/2011 through 12/31/2011</th>
<th>VOC Limit (g/l) Effective on and after 1/1/2012</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flat Coatings</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td>Nonflat Coatings</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Nonflat - High Gloss Coatings</td>
<td>150</td>
<td>150</td>
</tr>
<tr>
<td>Specialty Coatings</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aluminum Roof Coatings</td>
<td>400</td>
<td>400</td>
</tr>
<tr>
<td>Basement Specialty Coatings</td>
<td>400</td>
<td>400</td>
</tr>
<tr>
<td>Bituminous Roof Coatings</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td>Bituminous Roof Primers</td>
<td>350</td>
<td>350</td>
</tr>
<tr>
<td>Bond Breakers</td>
<td>350</td>
<td>350</td>
</tr>
<tr>
<td>Concrete Curing Compounds</td>
<td>350</td>
<td>350</td>
</tr>
<tr>
<td>Concrete/Masonry Sealers</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Driveway Sealers</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td>Dry Fog Coatings</td>
<td>150</td>
<td>150</td>
</tr>
<tr>
<td>Faux Finishing Coatings</td>
<td>350</td>
<td>350</td>
</tr>
<tr>
<td>Fire Resitive Coatings</td>
<td>350</td>
<td>350</td>
</tr>
<tr>
<td>Floor Coatings</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Form-Release Compounds</td>
<td>250</td>
<td>250</td>
</tr>
<tr>
<td>Graphic Arts Coatings (Sign Paints)</td>
<td>500</td>
<td>500</td>
</tr>
<tr>
<td>High Temperature Coatings</td>
<td>420</td>
<td>420</td>
</tr>
<tr>
<td>Industrial Maintenance Coatings</td>
<td>250</td>
<td>250</td>
</tr>
<tr>
<td>Low Solids Coatings (^1)</td>
<td>120(^1)</td>
<td>120(^1)</td>
</tr>
<tr>
<td>Magnesite Cement Coatings</td>
<td>450</td>
<td>450</td>
</tr>
<tr>
<td>Mastic Texture Coatings</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Metallic Pigmented Coatings</td>
<td>500</td>
<td>500</td>
</tr>
<tr>
<td>Multi-Color Coatings</td>
<td>250</td>
<td>250</td>
</tr>
<tr>
<td>Pre-Treatment Wash Primers</td>
<td>420</td>
<td>420</td>
</tr>
<tr>
<td>Primers, Sealers, and Undercoaters</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Reactive Penetrating Sealers (^2)</td>
<td>350</td>
<td>350</td>
</tr>
<tr>
<td>Recycled Coatings</td>
<td>250</td>
<td>250</td>
</tr>
<tr>
<td>Roof Coatings</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td>Rust Preventative Coatings</td>
<td>400</td>
<td>250</td>
</tr>
</tbody>
</table>
### TABLE OF STANDARDS 2 (continued) (Effective on and after 1/1/11)

Limits are expressed as VOC Regulatory, thinned to the manufacturer’s maximum thinning recommendation, excluding any colorant added to tint bases.

<table>
<thead>
<tr>
<th>COATING CATEGORY</th>
<th>VOC Limit (g/l)</th>
<th>VOC Limit (g/l)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Effective</td>
<td>Effective</td>
</tr>
<tr>
<td></td>
<td>1/1/2011 through</td>
<td>1/1/2012</td>
</tr>
<tr>
<td></td>
<td>12/31/2011</td>
<td></td>
</tr>
<tr>
<td>Shellacs:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clear</td>
<td>730</td>
<td>730</td>
</tr>
<tr>
<td>Opaque</td>
<td>550</td>
<td>550</td>
</tr>
<tr>
<td>Specialty Primers, Sealers, and Undercoaters</td>
<td>350</td>
<td>100</td>
</tr>
<tr>
<td>Stains</td>
<td>250</td>
<td>250</td>
</tr>
<tr>
<td>Stone Consolidants</td>
<td>450</td>
<td>450</td>
</tr>
<tr>
<td>Swimming Pool Coatings</td>
<td>340</td>
<td>340</td>
</tr>
<tr>
<td>Traffic Marking Coatings</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Tub and Tile Refinish Coatings</td>
<td>420</td>
<td>420</td>
</tr>
<tr>
<td>Waterproofing Membranes</td>
<td>250</td>
<td>250</td>
</tr>
<tr>
<td>Wood Coatings</td>
<td>275</td>
<td>275</td>
</tr>
<tr>
<td>Wood Preservatives</td>
<td>350</td>
<td>350</td>
</tr>
<tr>
<td>Zinc-Rich Primers</td>
<td>340</td>
<td>340</td>
</tr>
</tbody>
</table>

1 Units are grams of VOC per liter of coating, including water and exempt compounds in accordance with Section 3.77.

2 The dates listed do not preclude voluntary compliance with the applicable limit prior to those dates.

### 6.0 Administrative Requirements

#### 6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections 6.1.1 through 6.1.14 on the coating container (or label) in which the coating is sold or distributed.

6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.
ATTACHMENT E

Rule 4682- Polystyrene Foam, Polyethylene, and Polypropylene Manufacturing
District Rule 4682 was amended (9/20/2007). As analyzed, each amended section of the non-SIP version of the rule is at least as stringent as, or more stringent than the corresponding section of the SIP version of the rule. Therefore, it is concluded that overall the non-SIP version of the rule is more stringent than the SIP version of the rule.

<table>
<thead>
<tr>
<th>Requirement Category</th>
<th>SIP Version of Rule 4682 (6/16/94)</th>
<th>Non-SIP Version of Rule 4682 (9/20/07)</th>
<th>Conclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicability</td>
<td>Section 2.0 - any polystyrene foam, polyethylene, and polypropylene manufacturing and processing operations.</td>
<td>Section 2.0 - any manufacturing, processing, and storage of products composed of polystyrene, polyethylene, or polypropylene</td>
<td>The non-SIP version of Rule 4682 (9/20/07) is more stringent than the SIP version (6/16/94) since it is applicable to product storage, in addition to manufacturing and processing.</td>
</tr>
<tr>
<td>Exemptions</td>
<td>Section 4.0 - The provisions of Sections 5.1 and 5.2 shall not apply to manufacturing and processing operations using polymeric materials containing less than 1 percent volatile organic compounds by weight, and not using a blowing agent in their process.</td>
<td>Section 4.0 - The provisions of Sections 5.1, 5.2, and 5.3 shall not apply to manufacturing and processing operations using polymeric materials containing less than 1 percent volatile organic compounds by weight, and not using a blowing agent in their process.</td>
<td>The non-SIP version of Rule 4682 (9/20/07) is as stringent as the SIP version (6/16/94), since the section by section emission limits/VOC control requirements are identical.</td>
</tr>
<tr>
<td>Emissions Limit/VOC Control – until September 20, 2010</td>
<td>Section 5.1.1 - exclusive use of blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12); OR 5.1.2 - use of 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 percent by weight; OR 5.1.3 - VOC emissions controlled by a method which achieves an emission reduction equivalent to Section 5.1.2 and which does not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12).</td>
<td>Section 5.1.1 - exclusive use of blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12); OR 5.1.2 - use of 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 percent by weight; OR 5.1.3 - VOC emissions controlled by a method which achieves an emission reduction equivalent to Section 5.1.2 and which does not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12).</td>
<td>The non-SIP version of Rule 4682 (9/20/07) is as stringent as the SIP version (6/16/94), since the section by section emission limits/VOC control requirements are identical.</td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4682 (6/16/94)</td>
<td>Non-SIP Version of Rule 4682 (9/20/07)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>------------------------------------</td>
<td>----------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>Emissions Limit/VOC Control – after September 20, 2010</td>
<td>Section 5.1.1 - exclusive use of blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12); OR 5.1.2 - use of 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 percent by weight;</td>
<td>Section 5.3.2 - exclusive use of blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12); OR 5.3.3 – use of an approved emission control system (with an emission capture system that collects at least 90 percent by weight of the emissions, and a control device that reduces emissions from the emission capture system by at least 95 percent, by weight), manufacturing emissions vented to the approved emission control system; and emissions from the final manufactured product vented to the approved emission control system for at least 48 hours (if more than 800,000 pounds per calendar year of raw material is processed) or 24 hours (for all other operations); OR 5.3.4 - manufacturing emissions are no greater than the facility emissions which would occur under Section 5.3.3, and operations do not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12). OR 5.3.1 - total product emissions do not exceed 2.4 pounds of VOC per 100 pounds of total material processed, calculated over a monthly period. The total product emissions include emissions from the manufacturing operation, after controls, plus the residual blowing agent in the finished product.</td>
<td>When corresponding requirements are compared (sections 5.1.1 through 5.1.3 for the SIP version of the rule vs. sections 5.3.2 through 5.3.4 for the non-SIP version), the non-SIP version is more stringent because it includes a new requirement for the venting of emissions from the finished product into the control system, and also a requirement that the control system must be approved by the APCO. The new compliance option added to the non-SIP version of the rule, in section 5.3.1, is less stringent than the existing compliance options. Assuming a typical raw material with 6% VOC, the new option represents an overall emission reduction of 60%; whereas the requirements in the SIP version of the rule would require at least 85% overall control (90% capture and 95% control).</td>
</tr>
<tr>
<td>Blowing agent storage</td>
<td>Section 5-2 - no person shall place, hold or store any VOC blowing agent in any stationary tank, reservoir or container having a capacity greater than 200 gallons unless the container is a pressure vessel is equipped with an emission control device or system with a vapor recovery/control efficiency of at least 95 percent by weight.</td>
<td>Section 5-2 - no person shall place, hold or store any VOC blowing agent in any stationary tank, reservoir or container having a capacity greater than 200 gallons unless the container is a pressure vessel is equipped with an emission control device or system with a vapor recovery/control efficiency of at least 95 percent by weight.</td>
<td>The non-SIP version of Rule 4682 (9/20/07) is as stringent as the SIP version (6/16/94), since the section by section emission limits/VOC control requirements are identical.</td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4682 (6/16/94)</td>
<td>Non-SIP Version of Rule 4682 (9/20/07)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>------------------------------------</td>
<td>---------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>Recordkeeping</td>
<td>Section 6.1.1 - maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used; records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. Such records shall be retained for two years, and be made available upon request. 6.1.2 – if using an emissions control system, maintain daily records of key system operating and maintenance procedures which will demonstrate continuous operation and compliance of the emission control device; key system operating parameters are those necessary to ensure compliance with VOC emission requirements such as temperature, pressures, and flowrates. Such records shall be retained for two years, and be made available upon request. 6.1.4 - the operator shall keep in the facility all records required to demonstrate compliance with the requirements of this rule for a minimum of five years; records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, records shall be submitted to the APCO, ARB, or EPA upon request. 6.1.3 - Operators complying with Section 5.3.1 shall maintain records necessary to show compliance with that section and shall, once every month, calculate the daily average VOC emissions, based on the records for the preceding monthly period, according to the approved VOC emission calculation formula.</td>
<td>Section 6.1.1 - maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used; records shall be maintained with a minimum monthly totals, with the ability to calculate daily averages in any given month. 6.1.2 – if using an emissions control system, maintain daily records of key system operating and maintenance procedures which will demonstrate continuous operation and compliance of the emission control device; Key system operating parameters are those necessary to ensure compliance with VOC emission requirements such as temperature, pressures, and flowrates.</td>
<td>The non-SIP version of Rule 4682 (9/20/07) is more stringent than the SIP version of the rule because it requires records to be retained for a longer period, and provides more specifics regarding the manner in which records must be made available and the agencies to which such records must be made available.</td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4682 (6/16/94)</td>
<td>Non-SIP Version of Rule 4682 (9/20/07)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
<td>----------------------------------</td>
<td>-----------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>Test Methods</td>
<td>6.2.1 - The control efficiency of any air pollution control equipment shall be determined using EPA Methods 25 and 25A for measuring total gaseous organic concentrations at the inlet and outlet of the control device.</td>
<td>6.2.1 - The control efficiency of the emission control system shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates, and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device.</td>
<td>The non-SIP version of Rule 4682 (9/20/07) is more stringent than the SIP version of the rule since it specifies test methods for three more parameters (flow rates, capture efficiency, and VOC blowing agent contained in polymeric materials) than the SIP version of the rule, which specifies test methods for only two parameters (control efficiency of the control equipment, and exempt compounds).</td>
</tr>
<tr>
<td></td>
<td>6.2.2 - EPA Method 18 or ARB Test Method 422 for determination of exempt compounds and halogenated blowing agents.</td>
<td>6.2.2 - The capture efficiency of an emission capture control system shall be determined according to EPA’s “Guidelines for Determining Capture Efficiency,” January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>6.2.3 - EPA Method 18 or ARB Test Method 422 for determination of exempt compounds and halogenated blowing agents.</td>
<td>6.2.3 - EPA Method 18 or ARB Test Method 422 for determination of exempt compounds and halogenated blowing agents.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>6.2.4 - The VOC blowing agent contained in polymeric materials shall be determined using South Coast Air Quality Management District (SCAQMD) Method 306 (Analysis of Pentanes in Expandable Styrene Polymers) or Bay Area Air Quality Management District (BAAQMD) Method 45 (Determination of Butanes and Pentanes in Polymeric Materials).</td>
<td>6.2.4 - The VOC blowing agent contained in polymeric materials shall be determined using South Coast Air Quality Management District (SCAQMD) Method 306 (Analysis of Pentanes in Expandable Styrene Polymers) or Bay Area Air Quality Management District (BAAQMD) Method 45 (Determination of Butanes and Pentanes in Polymeric Materials).</td>
<td></td>
</tr>
</tbody>
</table>